

Honorable Kymberly K. Evanson

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

DEBRA S. O'NEAL,
Plaintiff,

v.

STATE FARM FIRE AND CASUALTY
COMPANY,
Defendant.

No. 2:23-cv-00232-KKE

**DECLARATION OF DUBS HERSCHLIP
IN SUPPORT OF PLAINTIFF'S MOTION
FOR ATTORNEY FEES AND COSTS**

NOTE ON MOTION CALENDAR:
DECEMBER 2, 2024

I, DUBS HERSCHLIP, declare as follows:

1. I am an attorney licensed to practice law in the State of Washington. I am a partner attorney for the law firm Dunlap Bennett & Ludwig PLLC and have been counsel of record for Plaintiff Debra S. O'Neal since 2020. I am competent to testify and make the following declaration based upon my personal knowledge and the records maintained by Plaintiff and Dunlap Bennett & Ludwig, PLLC, and under penalty of perjury of the laws of the State of Washington.

I. BACKGROUND AND EXPERIENCE

2. I have been practicing law since 2001, during which 23 years have included continuing

1 experience analyzing insurance coverage issues outside of court and litigating coverage
2 cases in court as well. These 23 years of experience include the time spent working as an
3 attorney in worker's compensation and personal injury law, analyzing cases for insurance
4 coverage for clients with several law firms, including Newton Night, L.L.P., where I
5 represented cities and entities in risk analysis and coverage decisions as well as
6 individuals. In addition, I regularly represented plaintiffs in their personal injury claims
7 arising from motor vehicle collisions and other accidents for which insurance coverage
8 was frequently at issue.

9 3. For example, one of the more challenging cases at Newton Kight that I was lead counsel
10 on was a case where I represented a family in their homeowner's insurance and umbrella
11 insurance coverage claims after their son allegedly set fire to an elementary school
12 dumpster in or around 2009 that spread causing hundreds of thousands of dollars in
13 damages. The parents' insurance denied coverage, and they were looking at losing
14 everything. I fought their insurance coverage issues for them and won coverage for the
15 entire loss arising from their minor child's misconduct by overcoming the insurer's
16 defense of exclusions for intentional wrongful acts.

17 4. I also represented a client in an interpretation of an insurance policy's beneficiary
18 designations in an insurance interpleader case in the Federal District Court for the Western
19 District of Washington but lost on summary judgment. *Std. Ins. Co. v. Nelson*, 2007 U.S.
20 Dist. LEXIS 36197, *1, 2007 WL 1453099.

21 5. Additionally, while at Newton Kight, I succeeded on an accidental death claim against a
22 life insurance policy provided by Zurich American Insurance Company by overcoming
23 their denial of life insurance coverage in the Federal District Court for the Western District

of Washington against the decedent's life insurance provider for the benefit of decedent's spouse. *Hawthorne v. Zurich Am. Ins. Co.*, 2007 U.S. Dist. LEXIS 44385 (2007).

6. I continued my insurance coverage practice with subsequent employers and my own firm, winning insurance coverage cases both inside and outside of court. For example, I succeeded in an insurance coverage contest arising from a claim of theft of personal property against my client's homeowner's insurance coverage in a case against Lloyd's of London in King County Superior Court case number 12-2-18792-4 SEA, *Crowford vs. Those Certain Underwriters At Lloyds Of London et al*, that was filed on or about May 25, 2012, and I succeeded on summary judgment as a solo practitioner on or about June 6, 2013. On March 1, 2013, I opened my own law firm, Dubs Ari Tanner Herschlip, PLLC, and won that case with little or no resources.

7. I have also represented a paralegal of a personal injury law firm against claims by an insurance company, Allstate Insurance Co., alleging that the law firm had committed fraud and ethical violations in relation to insurance claims filed with Allstate, which claims against my client were eventually settled outside of court. *See Allstate Ins. Co. v. Tacoma Therapy, Inc.*, 2014 U.S. Dist. LEXIS 52934, 2014 WL 1494100; *and see Allstate Ins. Co. v. Tacoma Therapy, Inc.*, 2013 U.S. Dist. LEXIS 126399 (W.D. Wash., Sept. 4, 2013).

8. Since 2013, I have focused my practice on avoiding litigation for my clients and assisting individuals and entities in setting up their businesses and estates, together with appropriate insurance coverage for their business and estate planning needs. I have also worked with individuals to set up insurance brokerages and with insurance brokers to conceptualize, develop, and price new business-risk insurance products.

9. I have worked with many businesses on their insurance coverage claims, some of which

1 have gone to court. For example, I recently appeared in *Houston Casualty Company v.*
2 *Awashington, LLC, et al.*, 2:24-cv-01647-BAT, a declaratory judgment action filed by an
3 insurer against my clients to affirm their denial of coverage of class action discrimination
4 claims filed against several businesses.

5 10. Since 2020, my firm, DATH PLLC, and eventually Dunlap Bennett & Ludwig, PLLC,
6 have been assisting Debra O’Neal with her claims against State Farm in the subject case.

7 11. My associate, Rafael Bultz, has been working substantially on this case since October
8 2023. Rafael Bultz has been an attorney since 2023 and has four years of legal experience,
9 including his experience prior to passing the bar. He has also worked on several other
10 insurance coverage cases, including the referenced *Houston Casualty Company v.*
11 *Awashington, LLC, et al.*, 2:24-cv-01647-BAT. Rafael Bultz is admitted to practice in
12 Washington State Courts and the U.S. District Court for the Western District of
13 Washington.

14 12. My associate, Alexander R. T. Rowan, began working substantially on this case in
15 December of 2023. Alexander Rowan has been an attorney since 2023 and has three years
16 of legal experience focused on trial and litigation, including as a judicial intern, extensive
17 trial experience as a law student working at the Blue Ridge Legal Services—a legal aid
18 society—and supporting the litigation and international arbitration teams at Norton Rose
19 Fulbright in their Washington, D.C. office. Alexander Rowan is admitted to practice in
20 Virginia State courts, the Eastern District of Virginia, and the Fourth Circuit Court of
21 Appeals.

22 13. My associate, Tracy Pearson, has worked on this case since July 2024. Tracy Pearson is
23 admitted to practice in Delaware state courts, New York state courts, and the U.S. District

1 Court for the District of Delaware. Tracy Pearson has over 15 years of experience in both
 2 litigation and legal transactions.

3 14. My former associate, Sara Kahan, very briefly worked on this matter in June of 2023.

4 II. ATTORNEY FEES AND EXPENSES IN THIS CASE

5 A. Total Fees and Costs

6 15. The total amount of attorney fees, costs, and expenses accumulated by Plaintiff and her
 7 attorneys from the beginning of this matter in 2020 to the filing of this motion, is
 8 \$615,556.77. *See* attached as **Exhibit A** is a true and correct copy of all recorded time
 9 entries entered for this matter through the time-keeping software Centerbase and prior
 10 billing software, Zola. Of this amount, \$554,611.50 were for only the attorney fees, and
 11 \$60,945.27 for only the expenses.

12 16. This matter was almost entirely worked on by a partner attorney, me, two associate
 13 attorneys, Rafael Bultz and Alexander Rowan, and paralegal William Adan. Additionally,
 14 my former paralegal/LLT Camdyn Joiner and the associates Tracy Pearson, Sara Kahan,
 15 and Austin Hatcher have also spent a brief time on this matter.

16 17. My firm billed 1,454.20 hours in this matter and \$554,611.50 in total, as outlined below,
 17 at an average attorney hourly rate of \$381.39.

18 18. Per DBL firm policy, I billed at a rate of \$550 per hour in 2024 and \$500 per hour in 2023.
 19 Additionally, my associates Rafael Bultz and Alexander Rowan billed at a rate of \$395
 20 per hour in 2024 and \$295 in 2023. My senior Associate Attorney Tracy Pearson billed at
 21 a rate of \$495 in 2024, and she only worked on this matter in 2024. Paralegal William
 22 Adan billed at a rate of \$195 per hour and Paralegal/LLT Camdyn Joiner billed at a rate
 23 of \$150 per hour. These rates are based on and equivalent to prevailing fees in the

community, and rate determinations in other cases (*see* attached as **Exhibit B** the Declaration of Franklin D. Cordell in Case No. 2:19-cv-01988-RSM of the Western District Court of Washington), particularly those setting the rate of \$550 per hour for myself as plaintiffs' lead attorney in the greater Puget Sound Area for federal insurance litigation.

Total attorney fees (2020-November 4, 2024)

Name	Position	2021/2022 rate per hour	2023 Rate per hour	2024 Rate per hour	Total hours	Total amount charged
Dubs Herschlip	Partner	\$350	\$500	\$595	350.00	\$146,820.00
Rafael Bultz	Associate	N/A	\$295	\$385	720.80	\$267,770.00
Alexander Rowan	Associate	N/A	\$295	\$395	237.00	\$93,185.00
Tracy Pearson	Senior Associate	N/A	N/A	\$495	3.30	\$1,633.50
Sara Kahan	Associate	N/A	\$295	N/A	0.40	\$118.00
Austin Hatcher	Associate	\$250	N/A	N/A	1.1	\$275.00
William Adan	Paralegal	N/A	\$195	\$195	116.50	\$22,717.00
Camdyn Joiner	Paralegal/LLLT	\$150	N/A	N/A	36.40	\$5,460.00
Total:					1,448.10	\$554,611.50

19. The total expenses incurred during the entirety of this matter are \$60,945.27, which include expert witness fees for Plaintiff's witness Robert J. Worth as outlined below.

Total expenses since 2020

Date	Expense	Amount
08/12/2021-04/22/22	Expenses for King County No. 21-2-10669-9	\$386.86
06/29/2023	State Records Request	\$2.70
12/11/2023-10/03/2024	USPS Mailing Fees	\$146.91

12/15/2023	Expert Witness Retainer	\$5,000.00
11/01/2024	Expert Witness Fees	\$48,069.14
10/18/2024	Process Services - Trial Subpoenas to SF Agent	\$180.00
10/26/2024	Trial Supplies and Print Production	\$1,330.41
11/04/2024	Trial Lodging, Food & Parking	\$2,534.13
11/01/2024 & 11/04/2024	T. Solmeyenko Witness Testimony	\$250.00
10/25/2024-11/4/2024	Debra O'Neal's expenses to attend trial	\$3,045.12
Total:		\$60,945.27

B. Attorney Fees and expenses prior to removal of this action in February of 2023

20. The total attorney fees and expenses before this action was removed to federal court in February 2023 were \$16,396.86 (USD), as outlined below.

21. The total attorney fees before this action was removed to federal court in February 2023 were \$16,010.00. Note that 8 hours of my total hours were at an hourly rate of \$400 instead of \$350, as it was during the time my rate went up.

<i>Total attorney fees prior to removal of current action to federal court in February of 2023</i>				
Name	Position	Hours	Hourly Rate	Total Amount
Dubs Herschlip	Attorney	31	\$350	\$10,275.00
Austin Hatcher	Attorney	1.1	\$250	\$275.00
Camdyn Joiner	Paralegal/L.L.L.T.	36.40	\$150	\$5,460.00
Total Attorney Fees				\$16,010.00

22. The total expenses prior to the removal of this action to federal court in February of 2023 are \$386.86 and include the statutory filing and service costs for bringing suit and obtaining a judgment against John Muse and Friends & Family Moving & Storage.

<i>Total expenses prior to removal of current action to federal court in February 2023</i>	
Expense	Amount
Expenses for King County Case No. 21-2-10669-9	\$386.86
Total	\$386.86

23. In the interest of reasonableness, fairness, and because of certain issues, such as missing the statute of limitations for breach of contract and the complaints from Defendant regarding proper notice of this matter under IFCA, I have removed all charges billed between the end of the case against John Muse and Friends & Family Moving & Storage in August, 2022, and the removal of this action to federal court in February 2023. Attached as **Exhibit C** is a true and correct copy of the approved cost bill breakdown in the referenced case King County No. 21-2-10669-9.

24. In the suit against John Muse and Friends & Family Moving & Storage, which underlies this case, the fees are broken down into 23 hours worked by me at a (2022) rate of \$350 for a personal total of \$7,075 USD. My associate at the time, Austin Hatcher, billed 1.1 hours at a rate of \$250 per hour for a total of \$275 USD. My Paralegal/LLT at the time, Camdyn Joiner, billed 27 hours at a rate of \$150 USD per hour, for her total of \$2,865 USD. All of the legal fees were incurred taking necessary actions dictated by State Farm in their claims handling process, such as filing police reports, investigating the at-fault parties, and obtaining a judgment against the at-fault parties.

C. Attorney Fees and expenses *since* the removal of this action to federal court in February of 2023 until jury verdict on November 4, 2024

25. The total costs and attorney fees totaled since the removal of this action to federal court in February 2023 to the jury verdict on November 4, 2024, are \$582,506.40. All of these

fees were necessarily incurred in responding to Defendant's actions, such as motions for summary judgment, discovery requests, depositions, teleconferences, stipulations, and trial preparation. Because Plaintiff had extremely limited resources, counsel for Plaintiff tried to keep the legal services to a minimum but was unable to resolve the case short of trial because Defendant made no settlement offers until the weeks before trial, which included an offer of judgment—a procedure intended to increase the risks to Plaintiff, rather than to actually resolve the case.

26. In the interest of fairness and being reasonable, I have removed the fees and costs from when O'Neal began this action, first in state court, in October 2022, and instead calculated the beginning date as February 2023, when Defendant removed this matter to federal court.

27. The total amount of attorney fees charged since the removal of this action to federal court in February of 2023 to the jury verdict on November 4, 2024, is \$521,948.00.

<i>Total attorney fees after removal of the case to federal court in February 2023 to jury verdict on November 4, 2024</i>					
Name	Position	Hourly Rate 2023	Hourly Rate 2024	Total Hours (2023 + 2024)	Total Amount Charged (2023 + 2024)
Dubs Herschlip	Partner Attorney	\$500	\$550	319.00	\$136,545.00
Rafael Bultz	Associate Attorney	\$295	\$385	720.80	\$267,770.00
Alexander Rowan	Associate Attorney	\$295	\$395	237.00	\$93,185.00
Tracy Pearson	Associate Attorney	N/A	\$495	3.30	\$1,633.50
William Adan	Paralegal	\$195	\$195	116.50	\$22,717.00
Ralph Jenkins	Paralegal	\$195	\$195	0.50	\$97.50
Total				1,347	\$521,948.00

28. During this time, I billed an overall total of 319.90 hours for an overall total amount of

1 \$136,545.00. In 2023, I billed 38.8 hours at an hourly rate of \$500 for a 2023 total amount
2 billed of \$19,400.00. In 2024, I billed 230.10 hours at an hourly rate of \$550, for a total
3 2024 amount billed of \$117,145.00, which includes \$9,410.00 that was written off as no-
4 charge time entries.

5 29. During this time, my associate Rafael Bultz billed an overall total of 720.80 hours for an
6 overall total amount of \$267,770.00. Of that, in 2023, Rafael Bultz billed 108.20 hours at
7 an hourly rate of \$295 for a total 2023 amount billed of \$31,919.00. It should be noted
8 that Rafael Bultz's actual hourly rate for 2023 was \$350, as seen in Exhibit A. However,
9 in the interest of fairness and reasonableness, I have calculated his 2023 using the \$295.00
10 rate instead. In 2024, Rafael Bultz billed 612.60 hours at a rate of \$385 for a total 2024
11 amount billed on \$235,851.00.

12 30. During this time, my associate Alexander Rowan billed an overall total of 237.00 hours
13 for an overall total amount billed of \$93,185.00. Of that, in 2023, Alexander Rowan billed
14 4.30 hours at an hourly rate of \$295 for a 2023 total amount billed of \$1,268.50. In 2024,
15 Alexander Rowan billed 232.70 hours at an hourly rate of \$395.00 for a 2024 total amount
16 billed of \$91,916.50.

17 31. During this time, my associate Tracy Pearson billed 3.30 hours at an hourly rate of \$495.00
18 for a total amount billed of \$1,633.50. Tracy Pearson only billed at one hourly rate.

19 32. During this time, my paralegal, William Adan, billed an overall total of 116.50 hours at
20 an hourly rate of \$195 for an overall total amount billed of \$22,717.00. William Adan's
21 rate did not change from 2023 to 2024.

22 33. During this time, my former associate Sara Kahan billed a total of 0.40 hours at an hourly
23 rate of \$295 for a total amount billed of \$118.00. Sara Kahan did not work on the matter

in 2024.

34. During this time, my firm's paralegal Ralph Jenkins billed for a total of 0.50 hours at an hourly rate of \$195.00 for a total amount billed of \$97.50. Ralph Jenkins did not work on this matter in 2024.

35. The total expenses billed in this case since the removal of this action to federal court in February of 2023 to the jury verdict on November 4, 2024, are \$60,558.41.

<i>Total expenses since the removal of the case to federal court in November of 2023 to jury verdict</i>		
Date	Expense	Amount
06/29/2023	State Records Request	\$2.70
12/11/2023-10/03/2024	USPS Mailing Fees	\$146.91
12/15/2023	Expert Witness Retainer	\$5,000.00
11/01/2024	Expert Witness Fees	\$48,069.14
10/18/2024	Process Services - Trial Subpoenas to SF Agent	\$180.00
10/26/2024	Trial Supplies and Print Production	\$1,330.41
11/04/2024	Trial Lodging, Food & Parking	\$2,534.13
11/04/2024	T. Solmeyenko Witness Testimony	\$250.00
Plaintiff's trial presence expenses		
10/25/2024-11/4/2024	Alaska Airlines flights	\$1,053.38
10/28/2024-11/1/2024	Hotel Stay - Staybridge Hotel Seattle	\$1,407.66
10/28/2024-11/1/2024	Rental car	\$332.60
10/28/2024-11/1/2024	Gasoline for rental car	\$44.27
11/1/2024-11/4/2024	Uber/Lyft transportation	\$96.70
10/25/2024-11/4/2024	Food/Meals	\$110.51
Total		\$60,558.41

36. Of the total expenses billed in this case since the removal of this action to federal court in

February of 2023 of \$60,558.41, the expense amount of \$53,069.14 was attributed to expert witness Robert J. Worth. Attached as **Exhibit C** is a copy of expert witness Robert J. Worth's bill for his services in this matter.

<i>Total expenses for expert witness only since removal of action to federal court in February of 2023</i>		
Date	Description	Amount
12/15/2023	Expert Witness Retainer	\$5,000.00
11/01/2024	Expert Witness Fees	\$48,069.14
Total		\$53,069.14

D. Attorney fees and expenses since the jury's verdict on November 4, 2024

37. Since the jury's verdict on November 4, 2024, the total amount of attorney's fees and expenses billed is \$16,653.5. These billing entries were necessitated to provide a fair and accurate accounting of all fees and expenses charged in this matter. Attached as **Exhibit E** are the attorney fees time entries between the jury's verdict and the filing of this motion.

38. Of that amount, \$16,653.50 was the total amount of just the attorney fees from the jury verdict on November 4 to November 18, 2024.

<i>Attorney fees from jury verdict November 4, 2024, to present</i>				
Name	Title	Rate	Hours	Amount
Dubs Herschlip	Partner	\$550.00	12.40	\$6,820.00
Rafael Bultz	Associate Attorney	\$395.00	21.00	\$8,085.00
Alexander Rowan	Associate Attorney	\$395.00	3.60	\$1,417.00
William Adan	Paralegal	\$195.00	1.70	\$331.50
Total			38.70	\$16,653.50

39. Of the total amount in ¶ 37 and Exhibit E, there were no charges for expenses.

1 I declare under penalty of perjury of the laws of the State of Washington that the foregoing
2 is true and correct.

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4
5 DATED: November 18, 2024

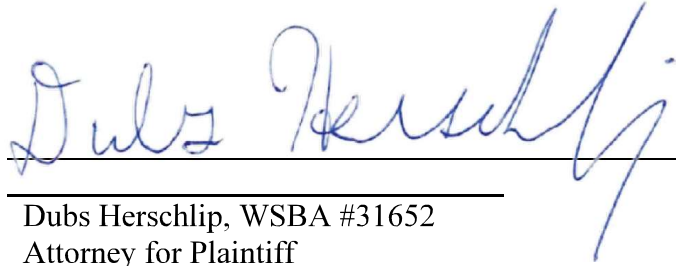
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8 Dubs Herschlip, WSBA #31652
9 Attorney for Plaintiff
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EXHIBIT A

7/7/2022	EMAIL CLIENT.	0.1	\$400.00	\$ 40.00 DH
7/7/2022	T.C. WITH CTJ.	0.1	\$ 400.00	\$ 40.00 DH
7/7/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ - CJ
6/14/2022	T.C. WITH CTJ.	0.1	\$ 400.00	\$ 40.00 DH
6/14/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ - CJ
6/13/2022	MEET WITH CTJ.	0.1	\$ 400.00	\$ 40.00 DH
6/13/2022	MEET WITH DATH. [N.C.]	0.1	\$ -	\$ - CJ
6/2/2022	T.C. WITH CTJ.	0.1	\$ 400.00	\$ 40.00 DH
6/2/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ - CJ
6/2/2022	RECEIVE AND REVIEW EMAIL FROM CTJ.REVIEW REVISED INVENTORY.	0.2	\$ 400.00	\$ 80.00 DH
6/2/2022	EDIT DOCUMENT.	1	\$ 150.00	\$ 1 50.00 CJ
6/2/2022	FINALIZE DRAFT AND EMAIL TO CLIENT.	0.1	\$ 150.00	\$ 15.00 CJ
6/1/2022	EDIT APPRAISAL.	1	\$ 150.00	\$ 1 50.00 CJ
6/1/2022	REVIEW ORDER SETTING TRIAL SCHEDULEAND MATERIALS NEED FOR MOTION FORDEFAULTJUDGMENT.	0.1	\$ 400.00	\$ 40.00 DH
5/25/2022	T.C. WITH CTJ.	0.1	\$ 350.00	\$ 35.00 DH
5/25/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ - CJ
5/23/2022	REVIEW CLIENT FILE. SEND COPY OFAPPRAISAL TO CLIENT.	0.1	\$ 150.00	\$ 15.00 CJ
5/23/2022	T.C. WITH CTJ. REVIEW FILE.	0.1	\$ 350.00	\$ 35.00 DH
5/23/2022	RECEIVE AND REVIEW EMAIL FROM CTJ.[N.C.]	0.1	\$ -	\$ - DH
5/20/2022	T.C. WITH MICK. [N.C.]	0.1	\$ -	\$ - CJ
5/20/2022	MEET WITH MICK.	0.1	\$ 150.00	\$ 15.00 CJ
5/16/2022	MEET WITH CTJ. [N.C.]	0.1	\$ -	\$ - DH
5/16/2022	MEET WITH DATH. [N.C.]	0.1	\$ -	\$ - CJ
5/11/2022	T.C. WITH CTJ.	0.1	\$ 350.00	\$ 35.00 DH
5/11/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ - CJ
5/11/2022	RECEIVE AND REPLY TO TEXTS FROM CTJ.[N.C.]	0.1	\$ -	\$ - DH
5/11/2022	T.C. WITH MICK. DRAFT NOTES TO FILE.SEND TEXT TO DATH.	0.1	\$ 350.00	\$ 35.00 DH
4/29/2022	DOWNLOAD PHOTOS (x16) ANDDOCUMENT FROM CLIENT. EMAIL TOEXPERT.	0.3	\$ 150.00	\$ 45.00 CJ
4/29/2022	T.C. WITH CTJ.	0.1	\$ 350.00	\$ 35.00 DH
4/29/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ - CJ
4/28/2022	T.C. WITH CTJ.	0.1	\$ 350.00	\$ 35.00 DH
4/28/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ - CJ
4/26/2022	MEET WITH EXPERT AND DATH. T.C WITHCLIENT. [N.C.]	1.5	\$ -	\$ - CJ
4/26/2022	REVIEW VOICEMAIL FROM CLIENT. READAND RESPOND TO TEXT FROM CLIENT.[N.C.]	0.1	\$ -	\$ - CJ
4/26/2022	MEET WITH MICK ODELL. T.C. WITHCLIENT.	0.9	\$ 350.00	\$ 3 15.00 DH
4/25/2022	REVIEW EMAILS FROM DATH, COURT,AND CLIENT. [N.C.]	0.1	\$ -	\$ - CJ
4/25/2022	SEND EMAIL TO CLIENT. [N.C.]	0.1	\$ -	\$ - CJ
4/25/2022	RECEIVE AND REVIEW EMAIL FROMCOURT WITH ATTACHED ORDER OFDEFAULT. EMAIL TO CLIENT.	0.2	\$ 350.00	\$ 70.00 DH
4/25/2022	RECEIVE AND REVIEW EMAIL FROMCLIENT. [N.C.]	0.1	\$ -	\$ - DH
4/22/2022	FINALIZE MOTION, DECLARATION OFCOUNSEL, AND PROPOSED ORDER. EFILEMOTION AND DECLARATION. SUBMIT			

	DOCUMENTS FOR EX PARTE PRESENTATION (x5). SEND EMAIL TODAY.	0.8 \$ 150.00 \$ 1 20.00 CJ
4/22/2022	T.C. WITH CTJ. X2	0.2 \$ 350.00 \$ 70.00 DH
4/22/2022	T.C. WITH DATH. [N.C.] X2	0.2 \$ - \$ - CJ
4/22/2022	REVIEW AND REVISE DECLARATION.	0.1 \$ 350.00 \$ 35.00 DH
4/21/2022	BEGIN DRAFTING MOTION.	0.1 \$ 150.00 \$ 15.00 CJ
4/21/2022	CONTINUE DRAFTING MOTION, DECLARATION OF COUNSEL, AND PROPOSED ORDER.	1.9 \$ 150.00 \$ 2 85.00 CJ
4/21/2022	REVIEW AND REVISE MOTION FOR DEFAULT.	1.2 \$ 350.00 \$ 4 20.00 DH
3/29/2022	RECEIVE AND REPLY TO EMAIL FROM CTJ WITH ATTACHMENTS.	0.2 \$ 350.00 \$ 70.00 DH
3/29/2022	RECEIVE AND REPLY TO EMAIL FROM CLIENT.	0.1 \$ 350.00 \$ 35.00 DH
3/28/2022	DRAFT LETTERS TO OP (x3). DRAFT DECLARATION OF MAILING. PREPARE DOCUMENTS (x10) FILED WITH THE COURT FOR SERVICE BY MAIL TO OP (x3).	1 \$ 150.00 \$ 1 50.00 CJ
3/28/2022	REVIEW FILE. UPDATE ACTION LIST. [N.C.]	0.1 \$ - \$ - DH
3/28/2022	T.C. WITH CTJ.	0.1 \$ 350.00 \$ 35.00 DH
3/28/2022	T.C. WITH DATH. [N.C.]	0.1 \$ - \$ - CJ
3/23/2022	DRAFT MOTION FOR ALTERNATIVE SERVICE AND DECLARATION OF PLAINTIFF.	2.3 \$ 350.00 \$ 8 05.00 DH
3/23/2022	DRAFT DECLARATION OF COUNSEL AND PROPOSED ORDER. T.C. WITH CTJ.	0.4 \$ 350.00 \$ 1 40.00 DH
3/23/2022	DRAFT PRIMARY WITNESS LIST DISCLOSURE.	0.4 \$ 350.00 \$ 1 40.00 DH
3/23/2022	RECEIVE AND REVIEW EMAILS FROM COURT AND CTJ. [N.C.]	0.1 \$ - \$ - DH
3/23/2022	EDIT MOTION AND DECLARATIONS (x2) FOR MOTION TO SERVE BY MAIL. CONDUCT SEARCH ON OPPOSING PARTY. ADD RESULTS TO DECLARATION OF DATH. REVIEW COURT MATTERS ALLOWED FOR EX PARTE VIA THE CLERK. EFILE DOCUMENTS (x5) AND SUBMIT FOR EX PARTE PRESENTATION. DOWNLOAD CONFIRMATIONS OF FILING.	2.2 \$ 150.00 \$ 3 30.00 CJ
3/4/2022	T.C. WITH MICK O'DELL.	0.2 \$ 350.00 \$ 70.00 DH
2/14/2022	RECEIVE AND REVIEW EMAIL FROM CTJ. [N.C.]	0.1 \$ - \$ - DH
1/20/2022	REVISE IFCA LETTER.	0.5 \$ 350.00 \$ 1 75.00 DH
1/17/2022	SEND EMAIL TO EXPERT WITNESS.	0.2 \$ 150.00 \$ 30.00 CJ
1/11/2022	RECEIVE AND REVIEW EMAIL FROM CLIENT. T.C. WITH CTJ.	0.1 \$ 350.00 \$ 35.00 DH
1/10/2022	RECEIVE AND REPLY TO THREE EMAILS FROM CLIENT.	0.1 \$ 350.00 \$ 35.00 DH
1/6/2022	RECEIVE AND REPLY TO EMAIL FROM CLIENT. [N.C.]	0.1 \$ - \$ - DH
1/6/2022	T.C. WITH CLIENT.	0.2 \$ 350.00 \$ 70.00 DH
1/6/2022	RECEIVE AND REPLY TO EMAIL FROM CLIENT. [N.C.]	0.1 \$ - \$ - DH
1/5/2022	RECEIVE AND REPLY TO EMAIL FROM CLIENT. [N.C.]	0.1 \$ - \$ - DH
1/4/2022	REVIEW FILE. SCAN EXPERT REPORT. EMAIL CLIENT.	0.1 \$ 350.00 \$ 35.00 DH
12/22/2021	RECEIVE AND REPLY TO EMAIL FROM CLIENT.	0.1 \$ 350.00 \$ 35.00 DH
12/22/2021	READ EMAILS FROM CLIENT AND DATH. [N.C.]	0.1 \$ - \$ - CJ
12/22/2021	T.C. WITH EXPERT. [N.C.]	0.1 \$ - \$ - CJ
12/22/2021	SEND AND RECEIVE TEXTS FROM DATH. [N.C.]	0.1 \$ - \$ - CJ
12/21/2021	REVIEW FILE.	0.1 \$ 350.00 \$ 35.00 DH
12/21/2021	MEET WITH EXPERT.	0.3 \$ 350.00 \$ 1 05.00 DH

12/21/2021	T.C. WITH EXPERT. EMAIL CLIENT.	0.2 \$ 350.00 \$ 70.00 DH
12/21/2021	RECEIVE AND REPLY TO EMAIL FROMCLIENT. [N.C.]	0.1 \$ - \$ - DH
12/21/2021	RECEIVE AND REVIEW EMAIL FROMCLIENT. [N.C.]	0.1 \$ - \$ - DH
12/20/2021	T.C. WITH EXPERT WITNESS.	0.2 \$ 350.00 \$ 70.00 DH
11/5/2021	RECEIVE AND REPLY TO EMAIL FROMCLIENT.	0.1 \$ 350.00 \$ 35.00 DH
10/22/2021	T.C. WITH APPRAISER. [N.C.]	0.1 \$ - \$ - CJ
10/22/2021	REDACT FINANCIAL STATEMENTS. EMAIL TO DATH.	0.3 \$ 150.00 \$ 45.00 CJ
10/22/2021	RECEIVE AND RESPOND TO TEXT FROMCLIENT.	0.1 \$ 150.00 \$ 15.00 CJ
10/21/2021	CALL TO APPRAISER. [N.C.]	0.1 \$ - \$ - CJ
10/13/2021	RECEIVE AND REVIEW EMAILS FROMCLIENT AND CTJ. [N.C.]	0.2 \$ - \$ - DH
10/11/2021	T.C. WITH CTJ.	0.1 \$ 350.00 \$ 35.00 DH
10/5/2021	T.C. WITH APPRAISER. [N.C.]	0.1 \$ - \$ - CJ
10/5/2021	SECOND T.C. WITH APPRAISER. SENDEMAIL TO APPRAISER. [N.C.]	0.1 \$ - \$ - CJ
10/4/2021	EDIT INVENTORY. REVIEW SECRETARY OFSITE WEBSITE FOR INFORMATION ONSTORAGE FACILITIES. EMAIL INVENTORYTO APPRAISER.	1 \$ 150.00 \$ 1 50.00 CJ
10/4/2021	SEND EMAIL TO CLIENT.	0.1 \$ 150.00 \$ 15.00 CJ
10/1/2021	READ AND RESPOND TO TEXTS FROMCLIENT. [N.C.]	0.1 \$ - \$ - CJ
9/30/2021	PREPARE FOR CLIENT MEETING. [N.C.]	0.1 \$ - \$ - CJ
9/30/2021	T.C. WITH CLIENT.	2.4 \$ 150.00 \$ 3 60.00 CJ
9/30/2021	RECEIVE VOICEMAIL FROM APPRAISER.RECEIVE TEXT FROM CLIENT. [N.C.]	0.1 \$ - \$ - CJ
9/29/2021	READ AND RESPOND TO EMAIL FROMCLIENT. [N.C.]	0.1 \$ - \$ - CJ
9/28/2021	RECEIVE AND REVIEW EMAILS FROM CTJAND STATE FARM. [N.C.]	0.1 \$ - \$ - DH
9/23/2021	RECEIVE AND RESPOND TO EMAIL FROMAPPRaiser. SEND TEXT TO CLIENT. TRACKPMT TO STATE FARM. DOWNLOADCONFIRMATION OF DELIVERY.	0.2 \$ 150.00 \$ 30.00 CJ
9/21/2021	T.C. WITH CTJ. REVIEW FILE.	0.1 \$ 350.00 \$ 35.00 DH
9/21/2021	T.C. WITH APPRAISER.	0.1 \$ 150.00 \$ 15.00 CJ
9/20/2021	READ EMAILS FROM CLIENT (x2). UPDATE CLIENT EFILE. [N.C.]	0.2 \$ - \$ - CJ
9/20/2021	SEARCH FOR VALUATION EXPERTCONTACT INFORAMATION. T.C. WITHVALUATION EXPERT. SEND AND RECEIVETEXTS FROM CLIENT. SEND EMAIL TOVALUATOR.	0.8 \$ 150.00 \$ 1 20.00 CJ
9/17/2021	RECEIVE AND REVIEW EMAILS FROMCLIENT. REVIEW FILE. EMAIL CLIENT. T.C.WITH CLIENT. EMAIL CLIENT.	0.5 \$ 350.00 \$ 1 75.00 DH
9/8/2021	T.C. WITH CTJ.	0.1 \$ 350.00 \$ 35.00 DH
9/8/2021	RECEIVE AND RESPOND TO EMAIL FROMPREMIUM PROCESS. [N.C.]	0.1 \$ - \$ - CJ
9/8/2021	READ AND RESPOND TO SECOND EMAILFROM PREMIUM PROCESS. [N.C.]	0.1 \$ - \$ - CJ
9/7/2021	MEET WITH CTJ.	0.1 \$ 350.00 \$ 35.00 DH
9/7/2021	MEET WITH CTJ. [N.C.]	0.1 \$ - \$ - CJ
9/7/2021	SECOND MEETING WITH CTJ.	0.1 \$ 350.00 \$ 35.00 DH
9/7/2021	SECOND MEETING WITH DATH. [N.C.]	0.1 \$ - \$ - CJ
9/3/2021	T.C. WITH CLIENT.	0.6 \$ 350.00 \$ 2 10.00 DH

9/3/2021	READ AND RESPOND TO EMAIL FROMCLIENT. [N.C.]	0.1 \$ - \$ - CJ
9/3/2021	DRAFT CHECK FOR PREMIUM PROCESS.PREPARE FOR MAILING.	0.1 \$ 150.00 \$ 15.00 CJ
8/18/2021	T.C. WITH CTJ. [N.C.]	0.1 \$ - \$ - DH
8/18/2021	T.C. WITH DATH. [N.C.]	0.1 \$ - \$ - CJ
8/17/2021	T.C. WITH CTJ.	0.1 \$ 350.00 \$ 35.00 DH
8/17/2021	T.C. WITH DATH. [N.C.]	0.1 \$ - \$ - CJ
8/12/2021	RECEIVE AND REVIEW EMAIL FROM COURT.	0.1 \$ 350.00 \$ 35.00 DH
7/30/2021	RECEIVE AND REPLY TO EMAILS FROMCLIENT. ATTEMPT TO CALL DEFENDANT.REVIEW AND REVISE SUMMONS ANDCOMPLAINT. EMAIL CTJ.	0.4 \$ 350.00 \$ 1 40.00 DH
7/30/2021	RECEIVE EMAIL FROM DATH. EDIT DOCUMETS (x2). EMAIL TO DATH.	0.3 \$ 150.00 \$ 45.00 CJ
7/30/2021	T.C. WITH DATH. EDIT DOCUMENTS. EMAIL TO DATH. [N.C.]	0.1 \$ - \$ - CJ
7/29/2021	RECEIVE AND REPLY TO EMAILS FROM CLIENT.	0.1 \$ 350.00 \$ 35.00 DH
7/21/2021	RECEIVE AND REPLY TO EMAIL FROM CLIENT. [N.C.]	0.1 \$ - \$ - DH
7/14/2021	T.C. WITH CTJ.	0.1 \$ 350.00 \$ 35.00 DH
7/14/2021	T.C. WITH DATH. [N.C.]	0.1 \$ - \$ - CJ
5/13/2021	RECEIVE AND REVIEW EMAILS FROMKENT POLICE AND CLIENT.	0.1 \$ 350.00 \$ 35.00 DH
5/12/2021	Filed police report with Kent Police -tracking number: T21001572	0.7 \$ 250.00 \$ 1 75.00 AFH
5/10/2021	RECEIVE AND REPLY TO EMAIL FROMCLIENT.	0.1 \$ 350.00 \$ 35.00 DH
5/10/2021	RECEIVE AND REVIEW EMAILS FROMCLIENT. [N.C.]	0.1 \$ - \$ - DH
2/3/2021	MEET WITH CTJ. [N.C.]	0.1 \$ - \$ - DH
2/3/2021	MEET WITH DATH. [N.C.]	0.1 \$ - \$ - CJ
1/28/2021	READ AND RESPOND TO TEXTS FROMCLIENT. [N.C.]	0.1 \$ - \$ - CJ
1/28/2021	T.C. WITH CLIENT.	0.5 \$ 150.00 \$ 75.00 CJ
11/13/2020	REVIEW DRAFT SUMMONS ANDCOMPLAINT. EMAIL TO CLIENT.	0.2 \$ 350.00 \$ 70.00 DH
11/11/2020	RECEIVE AND REVIEW EMAIL FROM CTJ. [N.C.]	0.1 \$ - \$ - DH
11/10/2020	MEET WITH CTJ.	0.1 \$ 350.00 \$ 35.00 DH
11/10/2020	MEET WITH DATH. [N.C.]	0.1 \$ - \$ - CJ
11/10/2020	RECEIVE AND REPLY TO EMAIL FROMCLIENT.	0.1 \$ 350.00 \$ 35.00 DH
11/9/2020	MEET WITH CTJ. RECEIVE AND REVIEWEMAILS FROM CTJ.	0.1 \$ 350.00 \$ 35.00 DH
11/9/2020	EMAIL TO CLIENT.	0.1 \$ 350.00 \$ 35.00 DH
11/6/2020	REVIEW SUMMONS AND COMPLAINT.RUN PEOPLE REPORT ON OP AND SEARCHCOUNTY RECORDER'S SITE FOR OWNERSHIP INFORMATION.	1 \$ 150.00 \$ 150.00 CJ
10/12/2020	T.C. WITH CTJ.	0.1 \$ 350.00 \$ 35.00 DH
10/12/2020	T.C. WITH DATH. [N.C.]	0.1 \$ - \$ - CJ
10/12/2020	READ AND RESPOND TO EMAILS FROMAH. [N.C.]	0.1 \$ - \$ - CJ
10/12/2020	CALL TO CLIENT. [N.C.]	0.1 \$ - \$ - CJ
10/12/2020	RECEIVE AND RESPOND TO MESSAGESFROM AH. [N.C.]	0.1 \$ - \$ - CJ
10/9/2020	RECEIVE AND REVIEW EMAIL FROM CTJ.	0.1 \$ 350.00 \$ 35.00 DH
10/8/2020	RECEIVE AND REVIEW DOCUMENTSFROM AH. SEND RESPONSE. [N.C.]	0.3 \$ - \$ - CJ

10/8/2020	RECEIVE AND RESPOND TO TEXTS FROM CLIENT. T.C. WITH CLIENT. DRAFT NOTE TO FILE. AND AH.	0.4 \$ 150.00 \$ 60.00 CJ	EMAIL TO DATH
10/8/2020	T.C. WITH CTJ. RECEIVE AND REPLY TO EMAIL AH.	0.2 \$ 350.00 \$ 70.00 DH	
10/7/2020	T.C. WITH AH AND CTJ.	0.1 \$ 350.00 \$ 35.00 DH	
9/17/2020	REVIEW VM FROM CLIENT. SEND TEXT. [N.C.]	0.1 \$ - \$ - CJ	
9/11/2020	T.C. WITH CLIENT. [N.C.]	0.1 \$ - \$ - CJ	
8/31/2020	REVIEW VM FROM CLIENT. CALL TO CLIENT. SEND EMAIL TO CLIENT. [N.C.]	0.1 \$ - \$ - CJ	
8/31/2020	T.C. WITH CLIENT.	0.2 \$ 150.00 \$ 30.00 CJ	
8/3/2020	CALL TO CLIENT. SEND EMAIL TO CLIENT. SET UP FILE. [N.C.]	0.2 \$ - \$ - CJ	
8/3/2020	DRAFT LEGAL SERVICES AGREEMENT. EMAIL TO CLIENT. [N.C.]	0.2 \$ - \$ - CJ	

7/14/2022	MEET WITH CTJ.	Dubs Herschlip	\$400.00	0.10	\$40.00
7/14/2022	MEET WITH DATH. [N.C.]	Camdyn Joiner	\$0.00	0.10	\$0.00
7/22/2022	REVIEW FILE.	Dubs Herschlip	\$400.00	0.10	\$40.00
7/25/2022	T.C. WITH CTJ.	Dubs Herschlip	\$400.00	0.30	\$120.00
7/25/2022	T.C. WITH DATH. [N.C.]	Camdyn Joiner	\$0.00	0.30	\$0.00
7/25/2022	BEGIN DRAFTING MOTION FOR DEFAULT JUDGMENT.	Dubs Herschlip	\$400.00	0.30	\$120.00
7/25/2022	SECOND T.C. WITH CTJ.	Dubs Herschlip	\$400.00	0.10	\$40.00
7/25/2022	SECOND T.C. WITH DATH. [N.C.]	Camdyn Joiner	\$0.00	0.10	\$0.00
7/25/2022	REVIEW FILE. TEXT CTJ. RECEIVE AND REVIEW EMAIL FROM CTJ. LM FOR CLIENT.	Dubs Herschlip	\$400.00	0.10	\$40.00
7/25/2022	T.C. WITH CLIENT.	Dubs Herschlip	\$400.00	0.10	\$40.00
7/25/2022	THIRD T.C. WITH CTJ.	Dubs Herschlip	\$400.00	0.10	\$40.00
7/25/2022	THIRD T.C. WITH DATH. [N.C.]	Camdyn Joiner	\$0.00	0.10	\$0.00
7/25/2022	RECEIVE AND REPLY TO EMAIL FROM CTJ TO MICK.	Dubs Herschlip	\$400.00	0.10	\$40.00
7/25/2022	EDIT APPRAISAL.	Camdyn Joiner	\$150.00	1.90	\$285.00
7/25/2022	T.C. WITH CLIENT.	Camdyn Joiner	\$150.00	0.20	\$30.00
7/25/2022	EDIT APPRAISAL PER CLIENT. EMAIL TO EXPERT WITNESS.	Camdyn Joiner	\$150.00	0.50	\$75.00
7/26/2022	T.C. WITH CTJ.	Dubs Herschlip	\$400.00	0.10	\$40.00
7/26/2022	T.C. WITH DATH. [N.C.]	Camdyn Joiner	\$0.00	0.10	\$0.00
7/26/2022	T.C. WITH EXPERT WITNESS.	Dubs Herschlip	\$400.00	0.10	\$40.00
7/26/2022	CONTINUE TO DRAFT MOTION FOR DEFAULT JUDGMENT. T.C. WITH CTJ. RECEIVE AND REPLY TO EMAIL FROM EXPERT WITNESS.	Dubs Herschlip	\$400.00	1.60	\$640.00
7/27/2022	T.C. WITH CTJ.	Dubs Herschlip	\$400.00	0.10	\$40.00
7/27/2022	T.C. WITH DATH. [N.C.]	Camdyn Joiner	\$0.00	0.10	\$0.00
7/27/2022	SECOND T.C. WITH CTJ. DICTATE REVISIONS TO PLAINTIFF'S DECLARATION. EMAIL CLIENT.	Dubs Herschlip	\$400.00	0.70	\$280.00
7/27/2022	RECEIVE AND REPLY TO EMAIL FROM CLIENT.	Dubs Herschlip	\$400.00	0.10	\$40.00
7/27/2022	DRAFT DECLARATION AND PREPARE EXHIBITS (x2).	Camdyn Joiner	\$150.00	1.10	\$165.00
7/27/2022	T.C. WITH CTJ. DICTATE MOTION FOR DEFAULT JUDGMENT.	Dubs Herschlip	\$400.00	0.10	\$40.00
7/27/2022	EDIT DECLARATION.	Camdyn Joiner	\$150.00	0.20	\$30.00
7/27/2022	EDIT MOTION, DEFAULT JUDGMENT, AND DECLARATION OF COUNSEL. DRAFT COST BILL AND PREPARE ATTACHMENTS. SEND EMAIL TO DATH.	Camdyn Joiner	\$150.00	3.00	\$450.00
7/27/2022	REVIEW TIME ENTRIES. REMOVE WORK RELATED TO INSURANCE COMPANY.	Dubs Herschlip	\$400.00	0.30	\$120.00
7/28/2022	REVIEW DOCUMENTS.	Camdyn Joiner	\$150.00	0.10	\$15.00
7/28/2022	FINALIZE DOCUMENTS. SCAN. ADD EXHIBITS TO DECLARATIONS AND COST BILL AND PREPARE FOR FILING. EFILE MOTION FOR DEFAULT JUDGMENT AND DOCUMENTS (x5). RECEIVE CONFIRMATION OF FILING. EMAIL COPIES TO CLIENT.	Camdyn Joiner	\$150.00	2.40	\$360.00
7/28/2022	POST CLIENT COST. [N.C.]	Camdyn Joiner	\$0.00	0.10	\$0.00
7/28/2022	REVISE DRAFT MOTION AND DECLARATION FOR DEFAULT JUDGMENT, AND COSTS BILL. EMAIL TO CLIENT.	Dubs Herschlip	\$400.00	2.30	\$920.00

7/28/2022	RECEIVE AND REVIEW EMAIL FROM CLIENT. MEET WITH CTJ. [N.C.] Dubs Herschlip	\$0.00	0.10	\$0.00
7/28/2022	MEET WITH CTJ. REVIEW KCLCR 55. [N.C.] Dubs Herschlip	\$0.00	0.20	\$0.00
7/29/2022	UPDATE CLIENT EFILE. [N.C.] Camdyn Joiner	\$0.00	0.10	\$0.00
8/3/2022	REVIEW CASE EVENTS. ORDER AND DOWNLOAD COPY OF ORDER. EMAIL COPY TO CLIENT. REVIEW CASE EVENTS. SEND EMAIL TO JUDGE'S BAILIFF. Camdyn Joiner	\$150.00	0.60	\$90.00
8/3/2022	READ AND RESPOND TO EMAIL FROM JUDGE'S BAILIFF. FORWARD COPY TO CLIENT. READ AND RESPOND TO EMAIL FROM CLIENT. Camdyn Joiner	\$150.00	0.10	\$15.00
8/3/2022	T.C. WITH CTJ. Dubs Herschlip	\$400.00	0.10	\$40.00
8/3/2022	T.C. WITH DATH. [N.C.] Camdyn Joiner	\$0.00	0.10	\$0.00
8/3/2022	RECEIVE AND REPLY TO EMAIL FROM COURT. FORWARD TO CLIENT. [N.C.] Dubs Herschlip	\$0.00	0.10	\$0.00
8/4/2022	RECEIVE AND REPLY TO EMAIL FROM CLIENT. Dubs Herschlip	\$400.00	0.10	\$40.00
8/4/2022	READ EMAILS FROM DATH AND CLIENT. SEND EMAIL TO CLIENT. [N.C.] Camdyn Joiner	\$0.00	0.10	\$0.00
8/4/2022	READ AND RESPOND TO EMAIL FROM CLIENT. [N.C.] Camdyn Joiner	\$0.00	0.10	\$0.00
8/5/2022	SEND EMAIL TO DATH. [N.C.] Camdyn Joiner	\$0.00	0.10	\$0.00
8/5/2022	RECEIVE AND REPLY TO EMAIL FROM CTJ. [N.C.] Dubs Herschlip	\$0.00	0.10	\$0.00
8/8/2022	SEARCH COUNTY RECORDS FOR ACTIVITY ON OPPOSING PARTY'S REAL PROPERTY. DOWNLOAD DOCUMENTS (x2). REVIEW RCWs. SEND TEXT TO DATH. Camdyn Joiner	\$150.00	0.50	\$75.00
8/12/2022	T.C. WITH CTJ. Dubs Herschlip	\$400.00	0.20	\$80.00
8/12/2022	T.C. WITH DATH. [N.C.] Camdyn Joiner	\$0.00	0.20	\$0.00
8/12/2022	T.C. WITH CONSULTING EXPERT WITNESS. Dubs Herschlip	\$400.00	0.10	\$40.00
8/15/2022	REVIEW CLIENT FILE. DRAFT AND SEND EMAIL TO CLIENT. Camdyn Joiner	\$150.00	0.30	\$45.00
8/15/2022	MEET WITH CTJ. Dubs Herschlip	\$400.00	0.10	\$40.00
8/15/2022	MEET WITH DATH. [N.C.] Camdyn Joiner	\$0.00	0.10	\$0.00
8/17/2022	T.C. WITH CTJ. Dubs Herschlip	\$400.00	0.10	\$40.00
8/17/2022	T.C. WITH DATH. [N.C.] Camdyn Joiner	\$0.00	0.10	\$0.00
8/17/2022	T.C. WITH CLIENT. EMAILS TO CLIENT. Dubs Herschlip	\$400.00	0.50	\$200.00

1/4/2023	TEXT CTJ. [N.C.] Dubs Herschlip	\$0.00	0.10	\$0.00
1/4/2023	T.C. WITH CTJ X2. EMAIL TO CTJ. Dubs Herschlip	\$400.00	0.70	\$280.00
1/4/2023	T.C. WITH DATH. [N.C.] X2 Camdyn Joiner	\$0.00	0.70	\$0.00
1/4/2023	REVIEW AND EXECUTE LETTER AND CHECK TO OIC FOR SERVICE ON STATE FARM. Dubs Herschlip	\$400.00	0.10	\$40.00
1/4/2023	T.C. WITH OIC. REVIEW OIC WEBSITE. Camdyn Joiner	\$150.00	0.20	\$30.00
1/4/2023	EDIT LETTER TO OIC AND COVERSHEET. PREPARE FOR MAILING COVERSHEET, LETTER, SUMMONS, AND COMPLAINT TO OIC (x2). Camdyn Joiner	\$150.00	0.60	\$90.00
1/4/2023	DRAFT CHECK FOR LEGAL SERVICE FEE TO OIC. MAIL DOCUMENTS AND PAYMENT VIA CERTIFIED MAIL. Camdyn Joiner	\$150.00	0.10	\$15.00
2/7/2023	RECEIVE AND REPLY TO EMAIL FROM CLIENT. Dubs Herschlip	\$400.00	0.10	\$40.00
2/8/2023	T.C. WITH CTJ. Dubs Herschlip	\$400.00	0.10	\$40.00
2/8/2023	T.C. WITH DATH. [N.C.] Camdyn Joiner	\$0.00	0.10	\$0.00
2/8/2023	REVIEW DOCUMENTS SENT TO THE INSURANCE COMMISSIONER. TRACK PACKAGE. Camdyn Joiner	\$150.00	0.20	\$30.00
2/8/2023	FORWARD EMAIL TO OPPOSING COUNSEL TO CLIENT. [N.C.] Camdyn Joiner	\$0.00	0.10	\$0.00
2/14/2023	MEET WITH CTJ. Dubs Herschlip	\$400.00	0.10	\$40.00
2/14/2023	MEET WITH DATH. [N.C.] Camdyn Joiner	\$0.00	0.10	\$0.00
2/15/2023	READ EMAIL FROM OPPOSING COUNSEL. REVIEW FILE FOR RECEIPT FROM OIC. RESPOND TO EMAIL FROM OC WITH RECEIPT. Camdyn Joiner	\$150.00	0.10	\$15.00
2/16/2023	RECEIVE EMAIL FROM FEDERAL COURT. EMAIL CLIENT. Dubs Herschlip	\$400.00	0.10	\$40.00
2/17/2023	RECEIVE AND REVIEW NOTICE FROM FEDERAL COURT. Dubs Herschlip	\$400.00	0.10	\$40.00
2/23/2023	REVIEW FILE AND COURT NOTICES. [N.C.] Dubs Herschlip	\$0.00	0.20	\$0.00
2/24/2023	T.C. WITH CTJ. Dubs Herschlip	\$400.00	0.10	\$40.00
2/24/2023	T.C. WITH DATH. [N.C.] Camdyn Joiner	\$0.00	0.10	\$0.00

Date:	Name:	Description	Rate	Hours	Total
3/6/2023	Dubs Herschlip	MEET WITH WA.	\$ 500.00	0.1	\$ 50.00
3/8/2023	Dubs Herschlip	MEET WITH WA.	\$ 500.00	0.1	\$ 50.00
3/8/2023	Dubs Herschlip	REVIEW COURT DOCKET AND PLEADINGS. DRAFT AND EXECUTE NOTICE OF APPEARANCE. FILE NOA. EMAIL OC. EMAIL WA.	\$ 500.00	1.5	\$ 750.00
3/10/2023	Dubs Herschlip	MEET WITH WA.	\$ 500.00	0.4	\$ 200.00
3/10/2023	Dubs Herschlip	DRAFT DISCOVERY PLAN.	\$ 500.00	0.3	\$ 150.00
3/10/2023	Dubs Herschlip	T.C. WITH OC.	\$ 500.00	0.2	\$ 100.00
3/10/2023	Dubs Herschlip	PREPARE FOR MEETING WITH OC. REVISE NOA. FILE NOA. REVIEW CASE DOCKET AND CASE FILE. EMAIL TO WA. RECEIVE AND REPLY TO EMAIL FROM POTENTIAL CASE FINANCIER. EMAIL CLIENT.	\$ 500.00	1	\$ 500.00
3/10/2023	William Adan	SCHEDULING TC AND CALENDAR, MEET WITH DUBS [NC]	\$ 175.00	0.4	\$ 70.00
3/13/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM WA AND OC. [N.C.]	\$ 500.00	0.1	\$ 50.00
3/13/2023	Dubs Herschlip	MEET WITH WA. [N.C.]	\$ 500.00	0.1	\$ 50.00
3/14/2023	Dubs Herschlip	MEET WITH WILL.	\$ 500.00	0.1	\$ 50.00
3/15/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM WA. [N.C.]	\$ 500.00	0.1	\$ 50.00
3/15/2023	Dubs Herschlip	EMAILED COMPLAINT AND ANSWER TO ELLIS BENNETT FOR REVIEW.[NC]	\$ 500.00	0.1	\$ 50.00
3/15/2023	Dubs Herschlip	T.C. WITH POTENTIAL LITIGATION FUNDING. [N.C.]	\$ 500.00	0.5	\$ 250.00
3/15/2023	Dubs Herschlip	EMAIL TO CLIENT AND EB.	\$ 500.00	0.1	\$ 50.00
3/16/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM CLIENT.	\$ 500.00	0.1	\$ 50.00
3/16/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM ELLIS BENNETT. [N.C.]	\$ 500.00	0.1	\$ 50.00
3/16/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM EB. EMAIL CONTINGENCY COMMITTEE. [N.C.]	\$ 500.00	0.3	\$ 150.00
3/17/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM WA AND CLIENT. [N.C.]	\$ 500.00	0.1	\$ 50.00
3/17/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM THE CONTINGENCY COMMITTEE. [N.C.] X3	\$ 500.00	0.4	\$ 200.00
3/22/2023	Dubs Herschlip	T.C. WITH CLIENT AND JAMESON (FINANCIER). [N.C.]	\$ 500.00	0.5	\$ 250.00
3/22/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM CLIENT. [N.C.]	\$ 500.00	0.1	\$ 50.00
3/22/2023	Dubs Herschlip	COMPLETE DOCUSIGN NDA. RECEIVE AND REPLY TO EMAILS FROM CLIENT. [N.C.]	\$ 500.00	0.2	\$ 100.00
3/22/2023	William Adan	TC WITH CLIENT	\$ 175.00	0.1	\$ 17.50
3/24/2023	Dubs Herschlip	MEET WITH WA.	\$ 500.00	0.1	\$ 50.00
3/27/2023	Dubs Herschlip	DRAFT JOINT STATUS REPORT. EMAIL OC.	\$ 500.00	1.4	\$ 700.00
3/27/2023	Dubs Herschlip	REVIEW STANDING ORDER FOR ALL CIVIL CASES. [N.C.]	\$ 500.00	0.4	\$ 200.00
3/27/2023	Dubs Herschlip	[N.C.]	\$ 500.00	0.1	\$ 50.00
3/27/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM THE FIRM FINANCING COMMITTEE. [N.C.] X3	\$ 500.00	0.3	\$ 150.00
3/28/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM OC.	\$ 500.00	0.1	\$ 50.00
3/28/2023	Dubs Herschlip	T.C. WITH JEREMY AND JAMESON AT LEGALIST. [N.C.]	\$ 500.00	0.6	\$ 300.00
3/29/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM OC. [N.C.]	\$ 500.00	0.1	\$ 50.00
3/29/2023	Dubs Herschlip	REPLY TO EMAIL FROM OC. [N.C.]	\$ 500.00	0.1	\$ 50.00
3/29/2023	Dubs Herschlip	JOINT STATUS CONFERENCE WITH OC JIM AND CHRIS.	\$ 500.00	0.6	\$ 300.00
3/29/2023	Dubs Herschlip	REVISE OC'S DRAFT JSR. PREPARE FOR TELECONFERENCE.	\$ 500.00	0.2	\$ 100.00
3/29/2023	Dubs Herschlip	REVIEW OC'S DRAFT JSR.	\$ 500.00	0.1	\$ 50.00
3/30/2023	Dubs Herschlip	MEET WITH WA. RECEIVE AND REPLY TO EMAIL FROM JAMESON [NC]	\$ 500.00	0.2	\$ 100.00
3/31/2023	Dubs Herschlip	RECEIVE AND REPLY TO SECOND EMAIL FROM CLIENT.	\$ 500.00	0.1	\$ 50.00
3/31/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM CLIENT.	\$ 500.00	0.1	\$ 50.00
3/31/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM CLIENT. [N.C.] X2	\$ 500.00	0.1	\$ 50.00
4/3/2023	Dubs Herschlip	T.C. WITH WA.	\$ 500.00	0.1	\$ 50.00
4/4/2023	Dubs Herschlip	MEET WITH WA.	\$ 500.00	0.1	\$ 50.00
4/4/2023	Dubs Herschlip	REVISE JSR. EMAIL OC.	\$ 500.00	0.2	\$ 100.00
4/5/2023	Dubs Herschlip	T.C. WITH CLIENT.	\$ 500.00	0.2	\$ 100.00
4/5/2023	Dubs Herschlip	MEET WITH WA.	\$ 500.00	0.1	\$ 50.00

4/5/2023	Dubs Herschlip	BEGIN DRAFTING INITIAL DISCLOSURES.	\$ 500.00	1.8	\$ 900.00
4/6/2023	Dubs Herschlip	MEET WITH WA. REVISE INITIAL DISCLOSURES. EMAIL CLIENT.	\$ 500.00	0.4	\$ 200.00
4/11/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM OC WITH ATTACHMENT.	\$ 500.00	0.1	\$ 50.00
4/12/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM WA. [N.C.]	\$ 500.00	0.1	\$ 50.00
4/12/2023	Dubs Herschlip	RECEIVE AND REVIEW SECOND EMAIL FROM OC WITH ATTACHMENT. REVIEW REDLINED JSR V5. RECEIVE AND REPLY TO EMAIL FROM OC.	\$ 500.00	0.2	\$ 100.00
4/12/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC.	\$ 500.00	0.1	\$ 50.00
4/13/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC.	\$ 500.00	0.1	\$ 50.00
4/13/2023	Dubs Herschlip	MEET WITH WA.	\$ 500.00	0.1	\$ 50.00
4/17/2023	William Adan	MEET WITH DUBS	\$ 175.00	0.1	\$ 17.50
4/17/2023	Dubs Herschlip	TEAMS MEETING WITH SK.	\$ 500.00	0.2	\$ 100.00
4/17/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM WA AND OC. [N.C.]	\$ 500.00	0.1	\$ 50.00
4/17/2023	Dubs Herschlip	MEET WITH WA.	\$ 500.00	0.1	\$ 50.00
4/17/2023	Sara Kahan	Discussed case background and goals with D Herschlip.	\$ 350.00	0.2	\$ 70.00
4/18/2023	Dubs Herschlip	EMAIL TO THE CONTINGENCY COMMITTEE. [N.C.]	\$ 500.00	0.4	\$ 200.00
4/18/2023	Dubs Herschlip	MEET WITH SK AND WA.	\$ 500.00	0.2	\$ 100.00
4/18/2023	Dubs Herschlip	[N.C.]	\$ 500.00	0.1	\$ 50.00
4/18/2023	William Adan	CALENDARED TRIAL DATES	\$ 175.00	0.1	\$ 17.50
4/18/2023	William Adan	EMAILED CLIENT JUDGE'S ORDERS FOR TRIAL DATES.	\$ 175.00	0.1	\$ 17.50
4/18/2023	Sara Kahan	Drafted First Set of Interrogatories.	\$ 350.00	1.1	\$ 385.00
4/19/2023	Dubs Herschlip	MEET WITH SK AND WA. [N.C.]	\$ 500.00	0.1	\$ 50.00
4/19/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM CONTINGENCY COMMITTEE. [N.C.]	\$ 500.00	0.1	\$ 50.00
4/20/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM SK. [N.C.]	\$ 500.00	0.1	\$ 50.00
4/20/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FRO SK. [N.C.]	\$ 500.00	0.2	\$ 100.00
4/20/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC. EMAIL SK.	\$ 500.00	0.1	\$ 50.00
4/20/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC. EXECUTE ESERVICE AGREEMENT. RECEIVE AND REVIEW EMAILS FROM SK AND WA. [N.C.]	\$ 500.00	0.2	\$ 100.00
4/20/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM OC AND SK. REVIEW REVISED DISCOVERY REQUESTS.	\$ 500.00	0.2	\$ 100.00
4/20/2023	Dubs Herschlip	REVISE INTERROGATORIES.	\$ 500.00	2.2	\$ 1,100.00
4/20/2023	Dubs Herschlip	MEET WITH SK AND WA. [N.C.]	\$ 500.00	0.2	\$ 100.00
4/20/2023	Dubs Herschlip	UPDATE ACTION LIST.	\$ 500.00	0.1	\$ 50.00
4/21/2023	Sara Kahan	Emailed D O'Neal with documents for review.	\$ 350.00	0.1	\$ 35.00
4/21/2023	Sara Kahan	Revised interrogatories.	\$ 350.00	0.6	\$ 210.00
4/21/2023	Sara Kahan	Reviewed E-Service Agreement.	\$ 350.00	0.1	\$ 35.00
4/24/2023	Dubs Herschlip	TEAMS MEETING WITH SK AND WA.	\$ 500.00	0.2	\$ 100.00
4/24/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM CLIENT.	\$ 500.00	0.1	\$ 50.00
4/24/2023	Sara Kahan	Revised Interrogatories.	\$ 350.00	0.2	\$ 70.00
4/24/2023	Sara Kahan	Case discussion.	\$ 350.00	0.1	\$ 35.00
4/25/2023	Dubs Herschlip	SECOND MEETIN WITH SK.	\$ 500.00	0.1	\$ 50.00
4/25/2023	Dubs Herschlip	MEET WITH SK.	\$ 500.00	0.2	\$ 100.00
4/25/2023	Dubs Herschlip	THIRD MEETING WITH SK.	\$ 500.00	0.1	\$ 50.00
4/25/2023	Dubs Herschlip	REVISE VERSION 3 OF DISCOVERY REQUESTS. EMAIL WA.	\$ 500.00	0.5	\$ 250.00
4/25/2023	Dubs Herschlip	DRAFT RESPONSE TO RESPONSE TO MOTION FOR SUMMARY JUDGMENT ON STATUTE OF LIMITATIONS AND DECLARATION IN SUPPORT.	\$ 500.00	0.5	\$ 250.00
4/25/2023	Dubs Herschlip	REVISE LSA. EMAIL CLIENT. [N.C.]	\$ 500.00	0.2	\$ 100.00
4/25/2023	Sara Kahan	Drafted contingency fee agreement.	\$ 350.00	0.2	\$ 70.00
4/25/2023	Sara Kahan	Discussed case with D Herschlip.	\$ 350.00	0.1	\$ 35.00
4/25/2023	Sara Kahan	Revised interrogatories.	\$ 350.00	0.3	\$ 105.00
4/26/2023	Dubs Herschlip	RECEIVE AND REVIEW LSA FROM CLIENT. [N.C.]	\$ 500.00	0.1	\$ 50.00
4/26/2023	Dubs Herschlip	REVIEW AND REVISE NOTICE OF UNAVAILABILITY. EMAIL WA. [N.C.]	\$ 500.00	0.1	\$ 50.00
4/27/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM WA AND OC. [N.C.]	\$ 500.00	0.1	\$ 50.00

4/27/2023	Dubs Herschlip	REVISE PLAINTIFF'S FIRST SET OF INTERROGATORIES AND EMAIL WA TO SEND TO OC.	\$ 500.00	0.4	\$ 200.00
4/27/2023	Sara Kahan	Reviewed Interrogatories.	\$ 350.00	0.2	\$ 70.00
4/28/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC.	\$ 500.00	0.1	\$ 50.00
5/2/2023	Dubs Herschlip	EMAIL SK.	\$ 500.00	0.1	\$ 50.00
5/4/2023	Sara Kahan	REVISED DECLARATION OF D HERSCHLIP.	\$ 350.00	0.3	\$ 105.00
5/4/2023	Dubs Herschlip	CASE STATUS CONFERENCE MEETING WITH SK AND WA. [N.C.]	\$ 500.00	0.1	\$ 50.00
5/4/2023	Sara Kahan	DISCUSSED CASE.	\$ 350.00	0.1	\$ 35.00
5/9/2023	Dubs Herschlip	EMAIL TO CLIENT. [N.C.]	\$ 500.00	0.1	\$ 50.00
5/9/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM CLIENT. [N.C.]	\$ 500.00	0.1	\$ 50.00
5/19/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC.	\$ 500.00	0.1	\$ 50.00
5/19/2023	Sara Kahan	ORGANIZED CLIENT FILE.	\$ 350.00	0.3	\$ 105.00
5/24/2023	William Adan	TC WITH CLIENT TO EMAIL LINK FOR TRUST DEPOSIT.	\$ 175.00	0.1	\$ 17.50
5/25/2023	Dubs Herschlip	EMAIL FINANCE DEPARTMENT. [N.C.]	\$ 500.00	0.1	\$ 50.00
5/25/2023	Dubs Herschlip	MEET WITH SK. X2	\$ 500.00	0.2	\$ 100.00
5/25/2023	Sara Kahan	DISCUSSED CASE x2	\$ 350.00	0.2	\$ 70.00
5/25/2023	William Adan	TC WITH CLIENT FOLLOWED UP TO INQUIRE ON TRUST DEPOSIT.	\$ 175.00	0.1	\$ 17.50
5/30/2023	Sara Kahan	RESEARCHED CASE LAW FOR RESPONSE TO MOTION FOR PARTIAL SUMMARY JUDGMENT.	\$ 350.00	0.4	\$ 140.00
5/30/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM SK. [N.C.]	\$ 500.00	0.1	\$ 50.00
5/30/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM SK. [N.C.]	\$ 500.00	0.1	\$ 50.00
5/30/2023	Dubs Herschlip	RECEIVE AND REPLY TO TEXT FROM SK.	\$ 500.00	0.1	\$ 50.00
5/30/2023	Sara Kahan	DRAFTED RESPONSE TO MOTION FFOR PARTIAL SUMMARY JUDGMENT.	\$ 350.00	0.7	\$ 245.00
5/31/2023	Dubs Herschlip	MEET WITH SK. EMAIL TO SK.	\$ 500.00	0.3	\$ 150.00
5/31/2023	Dubs Herschlip	FORWARD RECORDS TO SK.	\$ 500.00	0.2	\$ 100.00
5/31/2023	Dubs Herschlip	MEET WITH SK AGAIN.	\$ 500.00	0.1	\$ 50.00
6/5/2023	Dubs Herschlip	TEAMS MEETING WITH SK TO DICTATE REVISIONS TO DECLARATION.	\$ 500.00	0.2	\$ 100.00
6/5/2023	Dubs Herschlip	T.C. WITH SK.	\$ 500.00	0.1	\$ 50.00
6/5/2023	Sara Kahan	DRAFTED DECLARATION.	\$ 350.00	0.4	\$ 140.00
6/6/2023	Dubs Herschlip	CLIENT.	\$ 500.00	0.2	\$ 100.00
6/6/2023	Dubs Herschlip	TEAMS MEETING WITH SK.	\$ 500.00	0.1	\$ 50.00
6/7/2023	Dubs Herschlip	REVIEW SUBPOENAS. EMAIL CLIENT.	\$ 500.00	0.2	\$ 100.00

6/5/2023	Dubs Herschlip	TEAMS MEETING WITH SK TO DICTATE REVISIONS TO DECLARATION.	\$ 500.00	0.20	\$ 100.00
6/5/2023	Dubs Herschlip	T.C. WITH SK.	\$ 500.00	0.10	\$ 50.00
6/5/2023	Sara Kahan	DRAFTED DECLARATION.	\$ 350.00	0.40	\$ 140.00
6/6/2023	Dubs Herschlip	RECEIVE EMAIL FROM OC WITH SUBPOENAS ATTACHED. EMAIL TO CLIENT.	\$ 500.00	0.20	\$ 100.00
6/6/2023	Dubs Herschlip	TEAMS MEETING WITH SK.	\$ 500.00	0.10	\$ 50.00
6/7/2023	Dubs Herschlip	REVIEW SUBPOENAS. EMAIL CLIENT.	\$ 500.00	0.20	\$ 100.00
6/12/2023	Dubs Herschlip	RECEIVE DISCOVERY RESPONSES. EMAIL TO CLIENT.	\$ 500.00	0.10	\$ 50.00
6/12/2023	Dubs Herschlip	MEET WITH SK.	\$ 500.00	0.10	\$ 50.00
6/15/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM WA WITH TEXT FROM CLIENT ATTACHED.	\$ 500.00	0.10	\$ 50.00
6/27/2023	Dubs Herschlip	REVIEW AND REVISE DRAFT DECLARATION. EMAIL CLIENT.	\$ 500.00	0.20	\$ 100.00
6/28/2023	Dubs Herschlip	MEET WITH WA AND SK.	\$ 500.00	0.20	\$ 100.00
6/28/2023	Dubs Herschlip	MEET WITH WA.	\$ 500.00	0.10	\$ 50.00
6/28/2023	Dubs Herschlip	REVISE DECLARATION OF COUNSEL. EXECUTE DECLARATION. EMAIL WA.	\$ 500.00	2.30	\$ 1,150.00
6/28/2023	William Adan	Filed Declaration	\$ 175.00	0.20	\$ 35.00
6/30/2023	William Adan	Adjustment Entry	\$ (35.00)	1.00	\$ (35.00)
6/30/2023	Dubs Herschlip	Adjustment Entry	\$ (1,950.00)	1.00	\$ (500.00)
7/17/2023	Dubs Herschlip	UPDATE ACTION LIST. [N.C.]	\$ 500.00	0.10	\$ 50.00
7/18/2023	Dubs Herschlip	EMAIL OC. [N.C.]	\$ 500.00	0.10	\$ 50.00
7/20/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC. [N.C.]	\$ 500.00	0.10	\$ 50.00
9/20/2023	Dubs Herschlip	RESEARCH EXPERT WITNESSES. EMAIL CONTACTS.	\$ 500.00	0.60	\$ 300.00
9/20/2023	Dubs Herschlip	MEET WITH WA. REVIEW FILE.	\$ 500.00	0.20	\$ 100.00
10/5/2023	Dubs Herschlip	DRAFT NOTICE OF INTENT TO SUBPOENA. SUBMIT PUBLIC RECORDS REQUEST TO OIC.	\$ 500.00	0.60	\$ 300.00
10/10/2023	Dubs Herschlip	MEET WITH RB. [N.C.]	\$ 500.00	0.20	\$ 100.00
10/12/2023	William Adan	OC Furman requested access to discovery shared folder. Emailed him an his team a new link.	\$ 175.00	0.20	\$ 35.00
10/13/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM RB.	\$ 500.00	0.10	\$ 50.00
10/13/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM OC AND WA. MEET WITH RB.	\$ 500.00	0.20	\$ 100.00
10/16/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC. [N.C.]	\$ 500.00	0.10	\$ 50.00
10/16/2023	Dubs Herschlip	ONEAL REVISE LETTER REGARDING DEFICIENCIES OF DISCOVERY TO OC. EMAIL TO OC. EMAIL TO CLIENT. [N.C.]	\$ 500.00	1.50	\$ 750.00
10/16/2023	Dubs Herschlip	REVIEW PUBLIC RECORDS DISCLOSURE FROM OIC. [N.C.]	\$ 500.00	0.40	\$ 200.00
10/17/2023	Dubs Herschlip	UPDATE ACTION LIST.	\$ 500.00	0.10	\$ 50.00
10/17/2023	Rafael Bultz	Researched and drafted a Discovery Deficiency Letter based on inadequate responses by opposing party to our first set Interrogatories and Requests for Production.	\$ 350.00	4.50	\$ 1,575.00
10/20/2023	Dubs Herschlip	RECEIVE EMAIL FROM THE COURT WITH LINK TO MOTION FOR SUMMARY JUDGMENT. EMAIL TO WA AND RB.	\$ 500.00	0.50	\$ 250.00
10/23/2023	Dubs Herschlip	DISCOVERY CONFERENCE WITH OC (JIM AND CHRIS). EMAIL TO CLIENT.[N.C.]	\$ 500.00	1.00	\$ 500.00
10/23/2023	Dubs Herschlip	REVIEW DEFENDANT'S DISCOVERY RESPONSES. PREPARE FOR DISCOVERY CONFERENCE. REVIEW MOTION FOR SUMMARY JUDGMENT. [N.C.]	\$ 500.00	0.50	\$ 250.00
10/26/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM CLIENT. [N.C.]	\$ 500.00	0.10	\$ 50.00
10/27/2023	Dubs Herschlip	FILE STIPULATED MOTION FOR CONTINUANCE. [N.C.]	\$ 500.00	0.30	\$ 150.00
10/27/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM OC. REVISE STIPULATED ORDER OF CONTINUANCE. [N.C.]	\$ 500.00	0.30	\$ 150.00
10/27/2023	Dubs Herschlip	MEET WITH RB. [N.C.]	\$ 500.00	0.10	\$ 50.00
10/27/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM OC. MEET WITH RB. EMAIL CLIENT. [N.C.]	\$ 500.00	0.20	\$ 100.00
10/27/2023	Dubs Herschlip	EMAILS TO RB WITH ATTACHMENTS. [N.C.]	\$ 500.00	0.20	\$ 100.00
10/27/2023	Dubs Herschlip	REVISE STIPULATION AND ORDER FOR CONTINUANCE. EMAIL OC. [N.C.]	\$ 500.00	0.30	\$ 150.00
10/27/2023	Dubs Herschlip	EMAIL TO OC DISCOVERY CONFERENCE MEMO AND REQUEST FOR CONTINUANCE. [N.C.]	\$ 500.00	0.90	\$ 450.00
10/27/2023	Rafael Bultz	Drafted stipulation for continuance of Defendant's Motion for Summary Judgment hearing.	\$ 350.00	0.70	\$ 245.00
10/27/2023	Rafael Bultz	Drafted motion for continuance on Defendant's Motion for Summary Judgment hearing as well as declaration of D. Herschlip in support of it.	\$ 350.00	2.20	\$ 770.00
10/30/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM WA. [N.C.]	\$ 500.00	0.10	\$ 50.00
10/30/2023	Dubs Herschlip	REVIEW EMAIL FROM COURT. MEET WITH WA. EMAIL WA. [N.C.]	\$ 500.00	0.10	\$ 50.00
11/7/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM OC AND WA.	\$ 500.00	0.10	\$ 50.00
11/7/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC. EMAIL TO WA.	\$ 500.00	0.10	\$ 50.00
11/8/2023	Dubs Herschlip	EMAIL CLIENT.	\$ 500.00	1.00	\$ 500.00
11/13/2023	Dubs Herschlip	EMAIL TO OC. EMAIL TO CLIENT.	\$ 500.00	0.10	\$ 50.00
11/14/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM OC.	\$ 500.00	0.20	\$ 100.00

11/20/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM AR.	\$ 500.00	0.10	\$ 50.00
11/29/2023	Rafael Bultz	Preparation, review, and notating of documents in preparation of response to motion for summary judgment.	\$ 350.00	3.80	\$ 1,330.00
11/29/2023	Rafael Bultz	Drafted our response to the opposing party's motion for summary judgment.	\$ 350.00	1.40	\$ 490.00
11/30/2023	Rafael Bultz	Review and notating of documents and augmenting outline for our response to motion for summary judgment.	\$ 350.00	1.70	\$ 595.00
11/30/2023	Rafael Bultz	Legal research into motions for summary judgment law, compliance with statutory notice law case law, and research into refuting opposing counsel's case law citations.	\$ 350.00	2.10	\$ 735.00
11/30/2023	Rafael Bultz	Drafting of our response to the opposing party's motion for summary judgment.	\$ 350.00	2.10	\$ 735.00
12/1/2023	Rafael Bultz	Case law research for response to other party's partial motion for summary judgment.	\$ 350.00	1.60	\$ 560.00
12/1/2023	Rafael Bultz	Continued drafting of our response to opposing party's motion for partial summary judgment.	\$ 350.00	4.30	\$ 1,505.00
12/1/2023	Dubs Herschlip	MEET WITH RB.	\$ 500.00	0.30	\$ 150.00
12/3/2023	Rafael Bultz	Continued drafting of our response to opposing party's motion for partial summary judgment.	\$ 350.00	3.10	\$ 1,085.00
12/4/2023	Rafael Bultz	Continued drafting of our response to opposing party's motion for partial summary judgment.	\$ 350.00	4.10	\$ 1,435.00
12/4/2023	Rafael Bultz	Revised response to opposing party's partial motion for summary judgment based on D. Herschlip's feedback.	\$ 350.00	1.10	\$ 385.00
12/4/2023	Rafael Bultz	Drafted Decl of D. Herschlip in support of response to partial motion for summary judgment.	\$ 350.00	1.10	\$ 385.00
12/4/2023	Dubs Herschlip	MEET WITH RB. DICTATE REVISIONS TO RESPONSE TO MOTION FOR PARTIAL SJ.	\$ 500.00	0.50	\$ 250.00
12/4/2023	Dubs Herschlip	REVISE OUR RESPONSE TO MOTION FOR SUMMARY JUDGMENT.	\$ 500.00	1.40	\$ 700.00
12/4/2023	Dubs Herschlip	SECOND MEETING WITH RB.	\$ 500.00	0.10	\$ 50.00
12/4/2023	Dubs Herschlip	THIRD MEETING WITH RB. LEGAL RESEARCH.	\$ 500.00	0.30	\$ 150.00
12/4/2023	Alex Rowan	Meeting with other associate on case	\$ 295.00	0.40	\$ 118.00
12/4/2023	Alex Rowan	Case research	\$ 295.00	1.60	\$ 472.00
12/4/2023	Alex Rowan	editing motion for summary judgment	\$ 295.00	0.80	\$ 236.00
12/5/2023	Alex Rowan	Meeting with associate to discuss O'Neal motion for summary judgment and our response to their argument for (1) the breach of contract claim; and (2) the IFCA claim.	\$ 295.00	1.00	\$ 295.00
12/5/2023	Rafael Bultz	Conducted legal research into arguments for our response to Motion for Summary Judgment.	\$ 350.00	3.80	\$ 1,330.00
12/5/2023	Rafael Bultz	Revised our Response to the opposing party's Motion for Summary Judgment.	\$ 350.00	2.00	\$ 700.00
12/5/2023	Rafael Bultz	Call with fellow attorney A. Rowan to discuss the state of arguments and how to reinforce/adjust them based on the legal research conducted.	\$ 350.00	1.00	\$ 350.00
12/6/2023	Rafael Bultz	Conducted further legal research to strengthen our arguments in the Response to motion for summary judgment.	\$ 350.00	2.90	\$ 1,015.00
12/6/2023	Rafael Bultz	Revised our Response to motion for summary judgment to include more of the relevant facts, include proper citations, and augment our arguments.	\$ 350.00	4.20	\$ 1,470.00
12/7/2023	Alex Rowan	Editing response to Defendant's Mot. Summ. J. on the plaintiff's underlying claim of theft.	\$ 295.00	0.40	\$ 118.00
12/11/2023	Dubs Herschlip	MEET WITH RB AND WA.	\$ 500.00	0.50	\$ 250.00
12/11/2023	Dubs Herschlip	RECEIVE AND REVISE DRAFT RESPONSE TO MOTION FOR SUMMARY JUDGMENT AND DECLARATION OF COUNSEL. LEGAL RESEARCH.	\$ 500.00	1.70	\$ 850.00
12/11/2023	Dubs Herschlip	MEET WITH RB. X3	\$ 500.00	0.60	\$ 300.00
12/11/2023	Rafael Bultz	Legal research into statute of limitations for our breach of contract claim argument in our Response to Motion for Summary Judgment.	\$ 350.00	0.80	\$ 280.00
12/11/2023	Rafael Bultz	Revisions of our Response to Motion for Summary Judgment.	\$ 350.00	2.00	\$ 700.00
12/11/2023	Rafael Bultz	Added exhibits to our response to motion for summary judgment and updated D. Herschlip's declaration that accompanies it.	\$ 350.00	0.20	\$ 70.00
12/11/2023	Rafael Bultz	Made final revisions on our response to motion for summary judgment before filing with the court.	\$ 350.00	0.80	\$ 280.00
12/11/2023	William Adan	Meet with Dubs and Raf	\$ 175.00	0.50	\$ 87.50
12/12/2023	William Adan	Meet with DH and RB	\$ 175.00	0.80	\$ 140.00
12/12/2023	William Adan	Meet with Dubs	\$ 175.00	0.20	\$ 35.00
12/12/2023	Dubs Herschlip	MEET WITH RB AND WA.	\$ 500.00	0.80	\$ 400.00
12/12/2023	Dubs Herschlip	ZOOM MEETING WITH CONSULTING EXPERT, RB AND WA.	\$ 500.00	1.00	\$ 500.00
12/12/2023	Dubs Herschlip	MEET WITH WA.	\$ 500.00	0.20	\$ 100.00
12/12/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM OC AND WA. [N.C.]	\$ 500.00	0.10	\$ 50.00
12/12/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM CLIENT.	\$ 500.00	0.10	\$ 50.00
12/12/2023	Dubs Herschlip	REVISE PROPOSED ORDER.	\$ 500.00	0.30	\$ 150.00
12/12/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM CLIENT AND OC. [N.C.]	\$ 500.00	0.30	\$ 150.00

12/12/2023	Dubs Herschlip	MEET WITH RB. X3	\$ 500.00	0.50	\$ 250.00
12/12/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM COURT CLERK. EMAIL CLIENT. [N.C.]	\$ 500.00	0.10	\$ 50.00
12/12/2023	Rafael Bultz	Drafted proposed order to go with our Response to opponent's Motion for Partial Summary Judgment.	\$ 350.00	0.50	\$ 175.00
12/12/2023	Rafael Bultz	Researched and contacted potential expert witnesses to support our bad faith claim against State Farm.	\$ 350.00	1.10	\$ 385.00
12/12/2023	Rafael Bultz	Spoke with potential expert witness Mr. Worth on his ability to serve as an expert witness for us.	\$ 350.00	0.60	\$ 210.00
12/12/2023	Rafael Bultz	Zoom meeting with expert witness Mr. Worth to give him a run down of our case and deadlines moving forward.	\$ 350.00	1.00	\$ 350.00
12/12/2023	Rafael Bultz	Met with attorney D. Herschlip to discuss expert witness and timeline of moving forward with his services.	\$ 350.00	0.30	\$ 105.00
12/12/2023	Rafael Bultz	Revised Proposed Order in our Response to motion for partial summary judgment based on D. Herschlip's feedback.	\$ 350.00	1.10	\$ 385.00
12/13/2023	Rafael Bultz	Prepared expert's retainer agreement for attorney signature and return to Mr. Worth.	\$ 350.00	0.40	\$ 140.00
12/13/2023	Rafael Bultz	Researched and assembled folders with relevant documents for expert witness Mr. Worth's review and report.	\$ 350.00	4.10	\$ 1,435.00
12/13/2023	Rafael Bultz	Phone call with expert witness Mr. Worth to discuss timeline of his report.	\$ 350.00	0.40	\$ 140.00
12/13/2023	Rafael Bultz	Revised Proposed Order for our Response to motion for summary judgment based on Local Rules instructions.	\$ 350.00	0.60	\$ 210.00
12/13/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM RB. [N.C.]	\$ 500.00	0.10	\$ 50.00
12/13/2023	Dubs Herschlip	REVISE ORDER. MEET WITH RB.	\$ 500.00	0.20	\$ 100.00
12/13/2023	Dubs Herschlip	REVIEW AND EXECUTE CONSULTING EXPERT'S FEE AGREEMENT.	\$ 500.00	0.20	\$ 100.00
12/13/2023	Dubs Herschlip	REVIEW CLAIMS FILE. MEET WITH RB.	\$ 500.00	0.40	\$ 200.00
12/13/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM RB. REVISE PROPOSED ORDER DENYING MOTION FOR SUMMARY JUDGMENT.	\$ 500.00	0.20	\$ 100.00
12/13/2023	Dubs Herschlip	MEET WITH RB WHILE TELECONFERENCING WITH CONSULTING EXPERT. DICTATE WITNESS DISCLOSURE.	\$ 500.00	0.20	\$ 100.00
12/13/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM CONSULTING EXPERT. MEET WITH RB.	\$ 500.00	0.20	\$ 100.00
12/13/2023	Dubs Herschlip	MEET WITH RB. X2	\$ 500.00	0.20	\$ 100.00
12/14/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM COURT, OC AND WA. [N.C.]	\$ 500.00	0.20	\$ 100.00
12/14/2023	Dubs Herschlip	SECOND MEETING WITH RB.	\$ 500.00	0.10	\$ 50.00
12/14/2023	Dubs Herschlip	RECEIVE AND REVIEW NOTICE OF DEPOSITION. EMAIL TO CLIENT DEPOSITION PREP INSTRUCTIONS.	\$ 500.00	0.20	\$ 100.00
12/14/2023	Dubs Herschlip	RE-EXECUTE EXPERT'S RETAINER.	\$ 500.00	0.10	\$ 50.00
12/14/2023	Dubs Herschlip	MEET WITH RB.	\$ 500.00	0.10	\$ 50.00
12/14/2023	Dubs Herschlip	RECEIVE AND REVIEW DRAFT EMAIL TO CONSULTING EXPERT.	\$ 500.00	0.20	\$ 100.00
12/14/2023	Rafael Bultz	Revised expert witness retainer agreement based on Mr. Worth's suggestion and prepared for attorney signature.	\$ 350.00	0.30	\$ 105.00
12/14/2023	Rafael Bultz	Drafted witness disclosure list.	\$ 350.00	4.10	\$ 1,435.00
12/15/2023	Dubs Herschlip	T.C. WITH CLIENT.	\$ 500.00	0.20	\$ 100.00
12/15/2023	Dubs Herschlip	SECOND MEETING WITH RB TO PREPARE CLIENT FOR DEPOSITION.	\$ 500.00	0.40	\$ 200.00
12/15/2023	Dubs Herschlip	MEET WITH RB.	\$ 500.00	0.20	\$ 100.00
12/15/2023	Rafael Bultz	Drafting of witness disclosure list.	\$ 350.00	0.40	\$ 140.00
12/15/2023	Rafael Bultz	Drafted notes and timeline for meeting with client O'Neal for preparation of her deposition.	\$ 350.00	1.70	\$ 595.00
12/15/2023	Rafael Bultz	Call with client to go over preparation for her upcoming deposition.	\$ 350.00	1.30	\$ 455.00
12/16/2023	Rafael Bultz	Continued drafting witness disclosure list and researched potential witnesses.	\$ 350.00	1.40	\$ 490.00
12/17/2023	Rafael Bultz	Continued drafting witness disclosure list and researched potential witnesses.	\$ 350.00	2.50	\$ 875.00
12/17/2023	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM RB. REVISE PRELIMINARY WITNESS LIST.	\$ 500.00	0.30	\$ 150.00
12/18/2023	Dubs Herschlip	MEET WITH RB.	\$ 500.00	0.20	\$ 100.00
12/18/2023	Rafael Bultz	Finalized witness disclosure list based on D. Herschlip's feedback.	\$ 350.00	0.50	\$ 175.00
12/18/2023	Rafael Bultz	Edited and sent out email to expert witness R. Worth about documents to review.	\$ 350.00	0.10	\$ 35.00
12/18/2023	Rafael Bultz	Editing timeline of events in case document for our office and for client D. O'Neal's review.	\$ 350.00	3.50	\$ 1,225.00
12/19/2023	Rafael Bultz	Drafted notes and prepared documents for client D. O'Neal's deposition.	\$ 350.00	3.60	\$ 1,260.00
12/19/2023	Rafael Bultz	Met with D. Herschlip to discuss strategy for upcoming client's deposition.	\$ 350.00	0.60	\$ 210.00
12/19/2023	Rafael Bultz	Legal research into having the policy contract removed since SOL of bringing a claim under it passed.	\$ 350.00	0.80	\$ 280.00
12/19/2023	Rafael Bultz	Preparing and sending documents to client D. O'Neal to review before deposition.	\$ 350.00	0.50	\$ 175.00
12/19/2023	Rafael Bultz	Drafted notes to go over with the client D. O'Neal before upcoming deposition	\$ 350.00	0.60	\$ 210.00
12/19/2023	Dubs Herschlip	SECOND MEETING WITH RB	\$ 500.00	0.10	\$ 50.00

12/19/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM RB. REVIEW DEPOSITION PREP AND ATTORNEY NOTES.	\$ 500.00	0.40	\$ 200.00
12/19/2023	Dubs Herschlip	MEET WITH RB.	\$ 500.00	0.30	\$ 150.00
12/19/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAIL WITH DISCOVERY REQUESTS FROM OC'S LEGAL ASSISTANT.	\$ 500.00	0.10	\$ 50.00
12/19/2023	William Adan	Requested wire transfer information for Mr.Worth's records from DBL controller.	\$ 175.00	0.10	\$ 17.50
12/19/2023	William Adan	Executed signed engagement letter and mailed it to Mr. Worth's office.	\$ 175.00	0.40	\$ 70.00
12/19/2023	William Adan	scheduled call with client and attorneys for 12.20	\$ 175.00	0.10	\$ 17.50
12/19/2023	William Adan	Text with client and researched efile on behalf of client for accuracy of dates.	\$ 175.00	0.20	\$ 35.00
12/20/2023	Dubs Herschlip	T.C. WITH CLIENT AND RAFAEL. REVIEW FILE.	\$ 500.00	2.30	\$ 1,150.00
12/20/2023	Dubs Herschlip	MEET WITH RB.	\$ 500.00	0.10	\$ 50.00
12/20/2023	Rafael Bultz	Call with client D. O'Neal in preparation for deposition the next day.	\$ 350.00	2.90	\$ 1,015.00
12/21/2023	Rafael Bultz	Attended deposition of client D. O'Neal to support D. Herschlip, took notes, and determined what documents are needed to rehabilitate client's testimony moving forward.	\$ 350.00	5.80	\$ 2,030.00
12/21/2023	Dubs Herschlip	MEET WITH RB.	\$ 500.00	0.80	\$ 400.00
12/21/2023	Dubs Herschlip	APPEAR FOR SECOND HALF OF DEPOSITION OF CLIENT.	\$ 500.00	3.80	\$ 1,900.00
12/21/2023	Dubs Herschlip	APPEAR FOR DEPOSITION OF CLIENT.	\$ 500.00	3.10	\$ 1,550.00
12/21/2023	Dubs Herschlip	MEET WITH RB.	\$ 500.00	0.20	\$ 100.00
12/21/2023	William Adan	Troubleshoot with Debra Oneal for Zoom Deposition scheduled for today	\$ 175.00	0.30	\$ 52.50
12/22/2023	Dubs Herschlip	MEET WITH RB. RECEIVE AND REVIEW EMAIL FROM RB TO COURT.	\$ 500.00	0.10	\$ 50.00
12/22/2023	Rafael Bultz	Case research into having the policy contract removed since SOL of bringing a claim under it passed.	\$ 350.00	1.30	\$ 455.00
12/23/2023	Rafael Bultz	Case research into having the policy contract removed since SOL of bringing a claim under it passed.	\$ 350.00	1.10	\$ 385.00
12/25/2023	Rafael Bultz	Case research into having the policy contract removed since SOL of bringing a claim under it passed.	\$ 350.00	2.10	\$ 735.00
12/27/2023	Rafael Bultz	Meeting with D. Herschlip, A. Rowan, and W. Adan to discuss strategy and timeline moving forward.	\$ 350.00	0.10	\$ 35.00
12/27/2023	Rafael Bultz	Running background check and trying to find information about witness G. Abbott that opposing party is going to depose.	\$ 350.00	2.00	\$ 700.00
12/27/2023	Dubs Herschlip	T.C. WITH RB, AR AND WA.	\$ 500.00	0.30	\$ 150.00
12/27/2023	Alex Rowan	Strategy conference to discuss next steps.	\$ 295.00	0.10	\$ 29.50
12/27/2023	William Adan	Meet with Dubs	\$ 175.00	0.10	\$ 17.50
12/27/2023	Ralph Jenkins	Online research in connection with a background check for Glenn Abbott. Communicate with W, Adan and R. Bultz re: same.	\$ 195.00	0.50	\$ 97.50
12/28/2023	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB AND OPERATIONS. [N.C.]	\$ 500.00	0.10	\$ 50.00
12/28/2023	Rafael Bultz	Call with client about opposing party's ROGs, RFAs, and RFPs.	\$ 350.00	1.10	\$ 385.00
12/28/2023	Rafael Bultz	Searched client files for documents asked for in opposing party's requests for production.	\$ 350.00	2.30	\$ 805.00
12/28/2023	Rafael Bultz	Drafted our response to opposing party's ROGs, RFAs, and RFPs.	\$ 350.00	2.10	\$ 735.00
12/29/2023	Rafael Bultz	Began drafting plaintiff's second request for production.	\$ 350.00	1.10	\$ 385.00
12/29/2023	Rafael Bultz	Reviewed client file for Glenn Abbott's declaration in anticipation of his deposition by opposing party.	\$ 350.00	0.90	\$ 315.00
12/29/2023	Rafael Bultz	Began drafting cross-examination of Glenn Aboott, the witness being deposed by opposing party.	\$ 350.00	1.20	\$ 420.00
12/29/2023	Rafael Bultz	Further research into having the policy contract removed since SOL of bringing a claim under it passed.	\$ 350.00	0.70	\$ 245.00
1/3/2024	Rafael Bultz	Reviewed client file for information about the upcoming deposition of witness Glenn Abbott and started drafting cross-examination for deposition of Glenn Abbott.	\$ 350.00	1.50	\$ 525.00
1/3/2024	Rafael Bultz	Meeting with D. Herschlip to go over finding more information about Glenn Abbott for his upcoming deposition.	\$ 350.00	0.60	\$ 210.00
1/3/2024	Rafael Bultz	Started drafting our 2nd set of Interrogatories and Requests for Production.	\$ 350.00	0.60	\$ 210.00
1/3/2024	Dubs Herschlip	MEET WITH RB.	\$ 550.00	0.20	\$ 110.00
1/3/2024	Dubs Herschlip	MEET WITH RB AND WA. DEPO PREP. REVIEW FILES. CRIMINAL BACKGROUND SEARCH ON GLENN ABBOTT.	\$ 550.00	0.20	\$ 110.00
1/3/2024	William Adan	Meet with Dubs, Witness research	\$ 175.00	0.20	\$ 35.00
1/3/2024	William Adan	Email Process server Timofey Samoylenko requesting information.	\$ 175.00	0.20	\$ 35.00
1/4/2024	William Adan	Meet with Dubs,	\$ 175.00	0.10	\$ 17.50
1/4/2024	William Adan	Email to Mr. Worth.	\$ 175.00	0.10	\$ 17.50
1/4/2024	William Adan	Calendared trial dates	\$ 175.00	0.10	\$ 17.50
1/4/2024	Dubs Herschlip	REVIEW AND REVISE SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION. REPLY TO EMAIL FROM RB.	\$ 550.00	0.20	\$ 110.00

1/4/2024	Dubs Herschlip	MEET WITH RB.	\$ 550.00	0.20	\$ 110.00
1/4/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM WA AND PREMIUM PROCESS SERVICE.	\$ 550.00	0.10	\$ 55.00
1/4/2024	Rafael Bultz	Continued drafting 2nd set of Interrogatories and Requests for Production.	\$ 350.00	1.00	\$ 350.00
1/4/2024	Rafael Bultz	Started drafting Motion to Extend Arbitration Deadline.	\$ 350.00	0.50	\$ 175.00
1/4/2024	Rafael Bultz	Started drafting a subpoena to Office of Insurance Commissioner to obtain communications with parties in this matter.	\$ 350.00	2.90	\$ 1,015.00
1/4/2024	Rafael Bultz	Call with expert witness R. Worth to discuss timeline of case and receive any feedback on our draft of 2nd set of Interrogatories and Requests for Production.	\$ 350.00	0.50	\$ 175.00
1/5/2024	Rafael Bultz	Meeting with D. Herschlip and W. Adan to discuss strategy, deliverables, and next steps.	\$ 350.00	0.10	\$ 35.00
1/5/2024	Rafael Bultz	Revised 2nd set of Interrogatories and Requests for Production.	\$ 350.00	0.70	\$ 245.00
1/5/2024	Dubs Herschlip	REVIEW AND REVISE PLAINTIFF'S SECOND SET OF DISCOVERY REQUESTS. REPLY TO EMAIL FROM RB.	\$ 550.00	0.30	\$ 165.00
1/5/2024	Dubs Herschlip	MEET WITH WA AND RB.	\$ 550.00	0.10	\$ 55.00
1/5/2024	William Adan	Meet with Dubs	\$ 195.00	0.10	\$ 19.50
1/5/2024	William Adan	Revised Doc. Emailed OC.	\$ 195.00	0.40	\$ 78.00
1/5/2024	William Adan	Emailed client.	\$ 195.00	0.10	\$ 19.50
1/5/2024	William Adan	2nd email to client.	\$ 195.00	0.10	\$ 19.50
1/8/2024	William Adan	Review and replied to client email. Saved docs to client file.	\$ 195.00	0.20	\$ 39.00
1/8/2024	William Adan	2nd Review and replied to client email. Saved docs to client file.	\$ 195.00	0.20	\$ 39.00
1/8/2024	William Adan	Review and replied to client SMS.X3	\$ 195.00	0.20	\$ 39.00
1/8/2024	Dubs Herschlip	TEXTS WITH RB.	\$ 550.00	0.10	\$ 55.00
1/8/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM WA AND CLIENT.	\$ 550.00	0.20	\$ 110.00
1/8/2024	Rafael Bultz	Continued drafting subpoena to Office of the Insurance Commissioner.	\$ 385.00	1.50	\$ 577.50
1/8/2024	Rafael Bultz	Continued drafting questions for Defendant State Farm's deposition of Glenn Abbott.	\$ 385.00	2.30	\$ 885.50
1/9/2024	Rafael Bultz	Drafting of motion to extend discovery and joining of parties deadline.	\$ 385.00	1.50	\$ 577.50
1/9/2024	Rafael Bultz	Call with expert witness Robert J. Worth to discuss his current progress and timeline moving forward.	\$ 385.00	0.50	\$ 192.50
1/9/2024	Rafael Bultz	Communicating via email and phone with State Farm's attorney to propose a stipulation to extend the discovery deadline.	\$ 385.00	0.50	\$ 192.50
1/9/2024	Rafael Bultz	Final revision on subpoena to Office of Insurance Commissioner.	\$ 385.00	0.10	\$ 38.50
1/9/2024	Rafael Bultz	Finalized questions for State Farm's deposition of Glenn Abbott.	\$ 385.00	2.20	\$ 847.00
1/9/2024	Rafael Bultz	Drafting of declaration of expert witness Robert J. Worth in support of our motion to extend discovery deadline.	\$ 385.00	0.90	\$ 346.50
1/9/2024	Rafael Bultz	Final preparations for State Farm's deposition of Glenn Abbott - including saving relevant client files to local drive and printing necessary documents.	\$ 385.00	0.40	\$ 154.00
1/9/2024	Dubs Herschlip	RECEIVE AND REPLY TO TEXTS FROM RB. RECEIVE AND REVIEW EMAIL FROM OC.	\$ 550.00	0.20	\$ 110.00
1/9/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM OC. [N.C.] X2	\$ 550.00	0.20	\$ 110.00
1/9/2024	Dubs Herschlip	APPROVE NOTICE OF INTENT TO SDT OIC FOR EXECUTION AND MAILING.	\$ 550.00	0.20	\$ 110.00
1/9/2024	Dubs Herschlip	REVISE NOTICE OF INTENT TO SDT A THIRD TIME. RECEIVE AND REPLY TO EMAIL FROM WA.	\$ 550.00	0.10	\$ 55.00
1/9/2024	Dubs Herschlip	REVISE SDT TO OIC A SECOND TIME.	\$ 550.00	0.10	\$ 55.00
1/9/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL TO OC FOR DISCOVERY EXTENSION.	\$ 550.00	0.10	\$ 55.00
1/9/2024	Dubs Herschlip	TEAMS CALL WITH RB.	\$ 550.00	0.20	\$ 110.00
1/9/2024	Dubs Herschlip	TEAMS CALL WITH EXPERT WITNESS AND RB.	\$ 550.00	0.30	\$ 165.00
1/9/2024	Dubs Herschlip	REVISE SDT'S TO OIC. REPLY TO EMAIL FROM RB. EMAIL TO WA.	\$ 550.00	0.30	\$ 165.00
1/9/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM CLIENT AND WA WITH ATTACHMENTS.	\$ 550.00	0.20	\$ 110.00
1/9/2024	Dubs Herschlip	RECEIVE AND REPLY TO TEXTS. X6	\$ 550.00	0.20	\$ 110.00
1/9/2024	Dubs Herschlip	REVIEW AND REVISE QUESTIONS FOR DEPOSITION OF GLENN. TEXT RB.	\$ 550.00	0.20	\$ 110.00
1/9/2024	William Adan	Reviewed email from DH and RB. Revised docs and replied to DH.	\$ 195.00	0.30	\$ 58.50
1/9/2024	William Adan	2nd revision of Notice. Email DH	\$ 195.00	0.20	\$ 39.00
1/9/2024	William Adan	Reviewed and replied to DH. 3rd revision to Notice docs. Emailed OC	\$ 195.00	0.40	\$ 78.00
1/10/2024	William Adan	Email to DH requesting transcript.	\$ 195.00	0.10	\$ 19.50
1/10/2024	William Adan	2nd email to DH.	\$ 195.00	0.10	\$ 19.50
1/10/2024	William Adan	Meet with RB	\$ 195.00	0.10	\$ 19.50
1/10/2024	Dubs Herschlip	RECEIVE AND REVIEW DRAFT DECLARATION OF CLIENT. RECEIVE AND REPLY TO EMAIL FROM CLIENT. EMAIL RB.	\$ 550.00	0.30	\$ 165.00
1/10/2024	Dubs Herschlip	RECEIVE AND REVIEW REVISED DECLARATION OF EXPERT. REPLY TO EMAIL FROM RB.	\$ 550.00	0.20	\$ 110.00
1/10/2024	Dubs Herschlip	FORWARD COURT REPORT EMAIL WITH ATTACHMENT TO CLIENT AND WA.	\$ 550.00	0.10	\$ 55.00
1/10/2024	Dubs Herschlip	EMAIL OC.	\$ 550.00	0.10	\$ 55.00

1/10/2024	Dubs Herschlip	LEGAL RESEARCH. TEAMS CALL WITH RB. DICTATE REVISIONS TO DECLARATION OF ROBERT WORTH. DICTATE DECLARATION OF DEBRA O'NEAL AND MOTION FOR EXTENSION OF DISCOVERY DEADLINE.	\$ 550.00	0.40	\$ 220.00
1/10/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC.	\$ 550.00	0.10	\$ 55.00
1/10/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM COURT REPORTER.	\$ 550.00	0.10	\$ 55.00
1/10/2024	Rafael Bultz	Finalized declaration of expert witness Robert J. Worth in support of our motion to extend discovery deadline.	\$ 385.00	0.80	\$ 308.00
1/10/2024	Rafael Bultz	Meeting with D. Herschlip to discuss cancellation of Glenn Abbott's deposition and next steps.	\$ 385.00	0.40	\$ 154.00
1/10/2024	Rafael Bultz	Drafted the declaration of Debra O'Neal in support of our motion to extend discovery deadline.	\$ 385.00	0.50	\$ 192.50
1/10/2024	Rafael Bultz	Called and left voicemail for Debra O'Neal in regards to reviewing the declaration drafter for her in support of our motion to extend discovery deadline.	\$ 385.00	0.10	\$ 38.50
1/10/2024	Rafael Bultz	Call with client Debra O'Neal to discuss potential revisions of her declaration in support of our motion to extend discovery deadline and discuss documents needed to respond to State Farm's Requests for Admissions and Production.	\$ 385.00	0.30	\$ 115.50
1/11/2024	Rafael Bultz	Continued draft of our motion to extend discovery and joining parties deadlines.	\$ 385.00	2.10	\$ 808.50
1/11/2024	Rafael Bultz	Drafted motion to extend discovery and joining party deadlines.	\$ 385.00	2.10	\$ 808.50
1/11/2024	Rafael Bultz	TEAMS meeting with attorney A. Rowan on revising motion to extend discovery and joining parties deadlines.	\$ 385.00	0.50	\$ 192.50
1/11/2024	Rafael Bultz	TEAMS meeting with attorneys A. Rowan and D. Herschlip to discuss direction of new version of motion to extend discovery and joining parties deadlines.	\$ 385.00	0.80	\$ 308.00
1/11/2024	Rafael Bultz	Revised Motion to Extend Discovery and Joining Parties Deadlines as well as drafted declaration of D. Herschlip in support of it.	\$ 385.00	5.40	\$ 2,079.00
1/11/2024	Dubs Herschlip	REVISE DRAFT MOTION TO EXTEND DEADLINES AND DECLARATION OF COUNSEL IN SUPPORT OF MOTION.	\$ 550.00	3.00	\$ 1,650.00
1/11/2024	Dubs Herschlip	TEAMS CALL WITH RB AND AR. REVIEW DISCOVERY. DICTATE REVISIONS TO MOTION TO EXTEND DISCOVERY DEADLINE AND DEADLINE TO ADD NECESSARY PARTIES.	\$ 550.00	0.80	\$ 440.00
1/11/2024	Dubs Herschlip	TEAMS CALL WITH RB. REVIEW AND APPROVE ROBERT WORTH'S DECLARATION.	\$ 550.00	0.10	\$ 55.00
1/11/2024	Dubs Herschlip	MEET WITH RB.	\$ 550.00	0.10	\$ 55.00
1/11/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM CLIENT WITH DEPOSITION ATTACHED. MEET WITH RB AND WA. RECEIVE AND REVIEW EMAILS FROM RB.	\$ 550.00	0.30	\$ 165.00
1/11/2024	Dubs Herschlip	RESEARCH FEDERAL POVERTY LEVELS.	\$ 550.00	0.20	\$ 110.00
1/11/2024	Dubs Herschlip	TEAMS CALL WITH AR, RB AND WA.	\$ 550.00	0.10	\$ 55.00
1/11/2024	Alex Rowan	Strategy conference to discuss motion to extend discovery deadline and researching the judge	\$ 350.00	0.10	\$ 35.00
1/11/2024	Alex Rowan	Researching the judge	\$ 350.00	0.90	\$ 315.00
1/11/2024	Alex Rowan	Drafting and revising motion to extend discovery deadline	\$ 350.00	2.00	\$ 700.00
1/11/2024	Alex Rowan	Call with DH and RB to discuss motion and revisions	\$ 350.00	0.80	\$ 280.00
1/11/2024	Alex Rowan	Revising motion to extend discovery deadline and researching case law on Fed R. Civ. P. 16(b)(4)	\$ 350.00	3.00	\$ 1,050.00
1/11/2024	William Adan	Meet with DH, RB and AR	\$ 195.00	0.10	\$ 19.50
1/11/2024	William Adan	Revised docs. Filing and Email to OC.	\$ 195.00	0.50	\$ 97.50
1/12/2024	William Adan	Logged Court docs to local file. Email client.	\$ 195.00	0.20	\$ 39.00
1/12/2024	William Adan	Email to DH.	\$ 195.00	0.10	\$ 19.50
1/12/2024	William Adan	Travel to Post office and back	\$ 195.00	0.50	\$ 97.50
1/12/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM PACER AND WA. [N.C.] X8	\$ 550.00	0.20	\$ 110.00
1/13/2024	Alex Rowan	Researching the judge on Lex Machina and Lexis+ to review all materials created by her in order to give oral presentation tips to partner	\$ 350.00	1.00	\$ 350.00
1/15/2024	Alex Rowan	Researching the judge on Lex Machina and Lexis+ to review all materials created by her	\$ 350.00	0.50	\$ 175.00
1/15/2024	Dubs Herschlip	SECOND TEAMS CALL WITH RB AND AR.	\$ 550.00	0.50	\$ 275.00
1/15/2024	Dubs Herschlip	TEAMS CALL WITH AR, WA AND RB.	\$ 550.00	0.20	\$ 110.00
1/15/2024	Rafael Bultz	TEAMS call with D. Herschlip, A. Rowan, and W. Adan to discuss status of case and tasks moving forward.	\$ 385.00	0.40	\$ 154.00
1/15/2024	Rafael Bultz	Review of D. O'Neal's deposition transcript in preparation of filing corrections.	\$ 385.00	1.90	\$ 731.50
1/16/2024	Rafael Bultz	TEAMS meeting with D. Herschlip, W. Adan, and A. Rowan to discuss status of case and steps moving forward.	\$ 385.00	0.10	\$ 38.50
1/16/2024	Rafael Bultz	TEAMS meeting with D. Herschlip, W. Adan, and A. Rowan to discuss status of case and steps moving forward.	\$ 385.00	0.10	\$ 38.50
1/16/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM AR WITH ATTACHMENT.	\$ 550.00	0.10	\$ 55.00
1/16/2024	Dubs Herschlip	TEAMS CALL WITH AR, RB AND WA.	\$ 550.00	0.10	\$ 55.00
1/16/2024	Alex Rowan	Researching case law on a 12(c) motion for judgment on the pleadings and drafting motion.	\$ 350.00	5.10	\$ 1,785.00

1/16/2024	Alex Rowan	Strategy conference with DH, WA, and RB discussing next steps forward.	\$ 350.00	0.10	\$ 35.00
1/16/2024	Alex Rowan	Case law research on the applicability of the Twombly/Iqbal pleading standard in the Western District of Washington.	\$ 350.00	1.20	\$ 420.00
1/16/2024	Alex Rowan	Drafting the motion for judgment under the argument that Twombly/Iqbal do not apply.	\$ 350.00	1.10	\$ 385.00
1/16/2024	William Adan	Meet with DH RB and AR	\$ 195.00	0.10	\$ 19.50
1/16/2024	William Adan	Meet with RB. Calendared deadline	\$ 195.00	0.10	\$ 19.50
1/17/2024	William Adan	Reviewed response from the court. Email to DH 3X. Emailed client.	\$ 195.00	0.30	\$ 58.50
1/17/2024	William Adan	Reviewed Text from RB. Transcribed client letter. Emailed RB.	\$ 195.00	0.50	\$ 97.50
1/17/2024	William Adan	Reviewed email from OC's firm. Emailed OC's firm 2X	\$ 195.00	0.20	\$ 39.00
1/17/2024	Dubs Herschlip	RECEIVE AND REPLY TO MESSAGES FROM RB. REVIEW DISCOVERY. RECEIVE AND REVIEW NOTICES FROM COURT INCLUDING OC'S RESPONSE TO MOTION TO EXTEND, AND MODIFICATION OF PLEADING.	\$ 550.00	0.30	\$ 165.00
1/17/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM AR.	\$ 550.00	0.10	\$ 55.00
1/17/2024	Dubs Herschlip	T.C. WITH RB. EMAIL RB.	\$ 550.00	0.10	\$ 55.00
1/17/2024	Dubs Herschlip	RECEIVE AND REPLY TO TEXTS FROM RB.	\$ 550.00	0.10	\$ 55.00
1/17/2024	Dubs Herschlip	RECEIVE AND REPLY TO MESSAGES FROM AR.	\$ 550.00	0.10	\$ 55.00
1/17/2024	Rafael Bultz	Researched how to conduct a public records request through the Kent Police department.	\$ 385.00	0.50	\$ 192.50
1/17/2024	Rafael Bultz	Drafted our responses to the opposing party's First Set of Interrogatories and Requests for Production and Admission.	\$ 385.00	5.60	\$ 2,156.00
1/18/2024	Rafael Bultz	Email to client D. O'Neal regarding reviewing our responses to the opposing party's interrogatories and requests for production and admission.	\$ 385.00	0.20	\$ 77.00
1/18/2024	Rafael Bultz	Call with client D. O'Neal regarding her storage payments and her review of our discovery requests.	\$ 385.00	0.10	\$ 38.50
1/18/2024	Rafael Bultz	Revised our responses to opposing party's first set of interrogatories and requests for production and admission.	\$ 385.00	4.70	\$ 1,809.50
1/18/2024	Rafael Bultz	Revised our responses to opposing party's first set of interrogatories and requests for production and admission.	\$ 385.00	4.70	\$ 1,809.50
1/18/2024	Rafael Bultz	Further revisions of our responses to opposing party's first set of interrogatories, requests for production and admission.	\$ 385.00	1.10	\$ 423.50
1/18/2024	Dubs Herschlip	REVIEW FINAL DRAFTS OF DISCOVERY RESPONSES.	\$ 550.00	0.40	\$ 220.00
1/18/2024	Dubs Herschlip	MEET WITH RB. REVIEW DISCOVERY AGAIN.	\$ 550.00	0.10	\$ 55.00
1/18/2024	Dubs Herschlip	MEET WITH RB. REVIEW DISCOVERY. MEET WITH RB.	\$ 550.00	0.20	\$ 110.00
1/18/2024	Dubs Herschlip	REVIEW DRAFT DISCOVERY RESPONSES. MEET WITH RB. DICTATE REVISIONS.	\$ 550.00	0.50	\$ 275.00
1/18/2024	Dubs Herschlip	TEAMS CALL WITH AR.	\$ 550.00	0.10	\$ 55.00
1/18/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM AR.	\$ 550.00	0.10	\$ 55.00
1/18/2024	Dubs Herschlip	TEAMS MESSAGE TO RB.	\$ 550.00	0.10	\$ 55.00
1/18/2024	Alex Rowan	Conference with DH to discuss the 12(c) motion and judgment collection	\$ 295.00	0.10	\$ 29.50
1/18/2024	William Adan	Reviewed and replied to client's email.	\$ 195.00	0.10	\$ 19.50
1/18/2024	William Adan	Revised docs. Executed docs for signature. TC with client. SMS to client. Emailed OC.	\$ 195.00	0.70	\$ 136.50
1/19/2024	William Adan	Revised Doc. Emailed the court.	\$ 195.00	0.20	\$ 39.00
1/19/2024	William Adan	Revised Docs. Filed. Emailed OC.	\$ 195.00	0.50	\$ 97.50
1/19/2024	William Adan	Emailed client.	\$ 195.00	0.10	\$ 19.50
1/19/2024	Dubs Herschlip	REVIEW AND REVISE PROPOSED ORDER.	\$ 550.00	0.20	\$ 110.00
1/19/2024	Dubs Herschlip	REVIEW AND REVISE DRAFT REPLY AND DECLARATIONS IN SUPPORT OF REPLY.	\$ 550.00	0.70	\$ 385.00
1/19/2024	Dubs Herschlip	MEET WITH RB. DICTATE REVISIONS TO REPLY IN SUPPORT OF MOTION TO EXTEND TIME.	\$ 550.00	0.20	\$ 110.00
1/19/2024	Rafael Bultz	Drafted our reply to the opposing party's response to our motion to extend discovery and joining parties deadlines.	\$ 385.00	6.70	\$ 2,579.50
1/19/2024	Rafael Bultz	Drafted declaration of client D. O'Neal to go with our reply to opposing party's response to our motion to extend deadlines of discovery and joining parties.	\$ 385.00	0.70	\$ 269.50
1/19/2024	Rafael Bultz	Revised our reply to opposing party's response to our motion to extend discovery and joining parties deadlines.	\$ 385.00	0.40	\$ 154.00
1/19/2024	Rafael Bultz	Drafted proposed order to go along with our motion to extend discovery deadlines and join additional parties.	\$ 385.00	0.70	\$ 269.50
1/22/2024	Rafael Bultz	Review of client D. O'Neal's deposition transcript to prepare for filing any corrections.	\$ 385.00	2.50	\$ 962.50
1/22/2024	Dubs Herschlip	MEET WITH RB AND AR.	\$ 550.00	0.10	\$ 55.00
1/22/2024	William Adan	Reviewed and replied to email from RB.	\$ 195.00	0.10	\$ 19.50
1/23/2024	Alex Rowan	Researching companies that judgment can be sold to and other alternatives; corresponding results to partner DH	\$ 350.00	1.10	\$ 385.00
1/24/2024	Rafael Bultz	Worked through client D. O'Neal's deposition transcript to find any corrections to be made.	\$ 385.00	3.10	\$ 1,193.50

1/24/2024	Rafael Bultz	Prepared oral argument outline for hearing on opposing party's motion for summary judgment.	\$ 385.00	2.20	\$ 847.00
1/25/2024	Rafael Bultz	Worked through client D. O'Neal's deposition transcript to find any corrections to be made.	\$ 385.00	1.30	\$ 500.50
1/26/2024	Dubs Herschlip	MEET WITH RB.	\$ 550.00	0.10	\$ 55.00
1/28/2024	Rafael Bultz	Reviewed materials, statutes, and arguments and drafted notes in preparation of oral argument hearing on opposing party's motion for summary judgment.	\$ 385.00	3.10	\$ 1,193.50
1/29/2024	Rafael Bultz	Researched/reviewed research on judge's decisions on motions to dismiss and incorporated into notes for upcoming oral argument hearing.	\$ 385.00	2.10	\$ 808.50
1/29/2024	Rafael Bultz	Drafted oral argument outline for attorney D. Herschlip's use for hearing on opposing party's motion for summary judgment.	\$ 385.00	5.40	\$ 2,079.00
1/29/2024	Dubs Herschlip	REPLY TO EMAIL FROM RB. [N.C.]	\$ 550.00	0.10	\$ 55.00
1/29/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM AR.	\$ 550.00	0.20	\$ 110.00
1/29/2024	Alex Rowan	Analyzing judge's written decisions and summarizing findings of research, giving recommendation to attorney for briefs and oral argument	\$ 350.00	0.80	\$ 280.00
1/29/2024	William Adan	Reviewed response email from the court. Email and SMS to client	\$ 195.00	0.10	\$ 19.50
1/30/2024	Alex Rowan	Revising and editing judgment on the pleadings to dismiss defendant's affirmative defenses.	\$ 350.00	1.60	\$ 560.00
1/30/2024	Dubs Herschlip	PREPARE, REVISE AND REHEARSE FOR ARGUMENT TOMORROW. TEXT RB. RECEIVE AND REPLY TO EMAIL WITH ATTACHMENT.	\$ 550.00	1.50	\$ 825.00
1/30/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM AR.	\$ 550.00	0.10	\$ 55.00
1/30/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM RB.	\$ 550.00	0.10	\$ 55.00
1/30/2024	Rafael Bultz	Final revisions on outline for hearing on opposing party's motion for summary judgment.	\$ 385.00	1.40	\$ 539.00
1/30/2024	Rafael Bultz	Drafting of opening statement for hearing on Defendant's Motion for Summary Judgment.	\$ 385.00	1.80	\$ 693.00
1/31/2024	Rafael Bultz	Telephonically attended oral argument hearing on Defendant's Motion for Summary Judgment.	\$ 385.00	0.80	\$ 308.00
1/31/2024	Rafael Bultz	Call D. Herschlip to discuss the oral argument hearing on the Defendant's Motion for Summary Judgment results.	\$ 385.00	0.30	\$ 115.50
1/31/2024	Rafael Bultz	Drafted an outline of the results of the oral argument hearing on the Defendant's Motion for Summary Judgment and next steps moving forward.	\$ 385.00	1.10	\$ 423.50
1/31/2024	Rafael Bultz	Review and edit of our (12c) Motion for Judgment on the Pleadings in regard to the opposing party's affirmative defenses.	\$ 385.00	1.90	\$ 731.50
1/31/2024	Dubs Herschlip	RETURN TRAVEL.	\$ 550.00	0.60	\$ 330.00
1/31/2024	Dubs Herschlip	APPEAR AND PRESENT ORAL ARGUMENT AGAINST MOTION FOR SUMMARY JUDGMENT AND FOR EXTENSION OF DEADLINES.	\$ 550.00	1.00	\$ 550.00
1/31/2024	Dubs Herschlip	CONTINUE TO REVIEW AND REHEARSE ORAL ARGUMENT. LEGAL RESEARCH. TEXT TO WA AND RB.	\$ 550.00	1.80	\$ 990.00
1/31/2024	Dubs Herschlip	TRAVEL TO COURTHOUSE.	\$ 550.00	1.30	\$ 715.00
1/31/2024	Dubs Herschlip	PREPARE FOR ORAL ARGUMENT. PRINT ORAL ARGUMENT.	\$ 550.00	0.50	\$ 275.00
1/31/2024	William Adan	SMS with DH. TC with Client.	\$ 195.00	0.20	\$ 39.00
1/31/2024	William Adan	Called into hearing MSJ.	\$ 195.00	0.80	\$ 156.00
1/31/2024	William Adan	Scheduled deadlines	\$ 195.00	0.10	\$ 19.50
2/1/2024	William Adan	Reviewed Email from OC. Archived documents.	\$ 195.00	0.10	\$ 19.50
2/1/2024	William Adan	Archived court orders	\$ 195.00	0.10	\$ 19.50
2/1/2024	William Adan	Calendared new court deadlines	\$ 195.00	0.10	\$ 19.50
2/1/2024	William Adan	Meet with RB. Reviewed and revised documents. Emailed RB revisions.	\$ 195.00	0.20	\$ 39.00
2/1/2024	William Adan	Reviewed and replied to client's email.	\$ 195.00	0.10	\$ 19.50
2/1/2024	William Adan	Reviewed and replied to client's email.	\$ 195.00	0.10	\$ 19.50
2/1/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM RB.	\$ 550.00	0.10	\$ 55.00
2/1/2024	Dubs Herschlip	T.C. WITH RB AND WA.	\$ 550.00	0.30	\$ 165.00
2/1/2024	Dubs Herschlip	RECEIVE AND REVIEW OC'S EMAIL WITH PROPOSED PROTECTIVE ORDER ATTACHED, AND COURT'S ORDER EXTENDING DISCOVERY DEADLINES. EMAIL RB.	\$ 550.00	0.20	\$ 110.00
2/1/2024	Rafael Bultz	Revised Word version of 2nd set of interrogatories and requests for production to send to opposing attorney.	\$ 385.00	0.60	\$ 231.00
2/2/2024	Rafael Bultz	Legal research into potential of making an unjust enrichment argument against State Farm.	\$ 385.00	3.10	\$ 1,193.50
2/2/2024	Rafael Bultz	Drafted outline of activity and result of motion for summary judgment hearing, strategy moving forward, and outlined tasks and potential steps to take.	\$ 385.00	2.30	\$ 885.50
2/2/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM THE COURT AND RB. MEET WITH RB.	\$ 550.00	0.20	\$ 110.00
2/5/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM RB.	\$ 550.00	0.10	\$ 55.00
2/5/2024	Dubs Herschlip	T.C. WITH AR AND RB.	\$ 550.00	0.30	\$ 165.00

2/5/2024	Rafael Bultz	Communicated with expert witness Mr. Worth regarding extension of discovery deadlines.	\$ 385.00	0.40	\$ 154.00
2/5/2024	Rafael Bultz	TEAMS meeting with D. Herschlip, A. Rowan, and W. Adan to discuss status of case and steps/strategy moving forward.	\$ 385.00	0.10	\$ 38.50
2/5/2024	Rafael Bultz	Revised State Farm's protective order regarding claims manual and related documents.	\$ 385.00	1.10	\$ 423.50
2/5/2024	Alex Rowan	Strategy conference with DH, RB, and WA to discuss judgment on the pleadings and sale of judgment.	\$ 350.00	0.20	\$ 70.00
2/5/2024	William Adan	Meet with DH, RB and AR.	\$ 195.00	0.10	\$ 19.50
2/6/2024	Rafael Bultz	Revised stipulated protective order from opposing counsel.	\$ 385.00	0.70	\$ 269.50
2/6/2024	Rafael Bultz	Accumulating and providing necessary documents to expert witness Mr. Worth.	\$ 385.00	1.80	\$ 693.00
2/6/2024	Rafael Bultz	Revised errata sheet regarding deposition transcript.	\$ 385.00	1.30	\$ 500.50
2/6/2024	Dubs Herschlip	REVIEW PROPOSED PROTECTIVE ORDER. RECEIVE AND REPLY TO EMAILS FROM RB.	\$ 550.00	0.20	\$ 110.00
2/6/2024	Dubs Herschlip	RECEIVE EMAILS FROM RB AND COURT REPORTER. X3 [N.C.]	\$ 550.00	0.20	\$ 110.00
2/6/2024	Dubs Herschlip	THIRD MEETING WITH RB.	\$ 550.00	0.30	\$ 165.00
2/6/2024	Dubs Herschlip	SECOND MEETING WITH RB.	\$ 550.00	0.10	\$ 55.00
2/6/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM EXPERT WITNESS.	\$ 550.00	0.10	\$ 55.00
2/6/2024	Dubs Herschlip	MEET WITH RB.	\$ 550.00	0.20	\$ 110.00
2/7/2024	Dubs Herschlip	REVIEW PROPOSED PROTECTIVE ORDER, OUR REVISIONS, AND OC'S EMAIL. EMAIL TO OC.	\$ 550.00	0.30	\$ 165.00
2/7/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM CLIENT.	\$ 550.00	0.10	\$ 55.00
2/7/2024	Rafael Bultz	Revisions of errata sheet of deposition transcript.	\$ 385.00	1.10	\$ 423.50
2/7/2024	William Adan	Meet with DH. TC with client. Emailed follow up to client.	\$ 195.00	0.30	\$ 58.50
2/8/2024	William Adan	Meet with DH, AR and RB.	\$ 195.00	0.10	\$ 19.50
2/8/2024	William Adan	Review, revised and filed documents. Emailed OC filed court documents. Mailed hard copies to OC.	\$ 195.00	1.30	\$ 253.50
2/8/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC TO SCHEDULE CONFERENCE TO DISCUSS PROTECTIVE ORDER. REVIEW AND REVISE CR 12(C) MOTION. EMAIL TO WA.	\$ 550.00	0.60	\$ 330.00
2/8/2024	Dubs Herschlip	RECEIVE AND REPLY TO ANOTHER EMAIL FROM OC.	\$ 550.00	0.20	\$ 110.00
2/8/2024	Dubs Herschlip	MEET WITH RB, WA AND AR.	\$ 550.00	0.20	\$ 110.00
2/8/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC.	\$ 550.00	0.10	\$ 55.00
2/8/2024	Alex Rowan	Conference call with DH, WA, and RB, to discuss the 12(c) motion.	\$ 350.00	0.10	\$ 35.00
2/9/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB AND COURT REPORTER. [N.C.]	\$ 550.00	0.10	\$ 55.00
2/9/2024	Dubs Herschlip	RECEIVE AND REVIEW ERRATA AND COVER LETTER. REPLY TO EMAIL FROM RB.	\$ 550.00	0.20	\$ 110.00
2/9/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM OC.	\$ 550.00	0.10	\$ 55.00
2/9/2024	Dubs Herschlip	T.C. WITH OC.	\$ 550.00	0.40	\$ 220.00
2/9/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM RB. PREPARE FOR T.C. WITH OC.	\$ 550.00	0.50	\$ 275.00
2/9/2024	Rafael Bultz	Finish revising errata sheet of deposition transcript and send out to client and drafted cover sheet.	\$ 385.00	2.50	\$ 962.50
2/9/2024	William Adan	Archived signed errata sheet.	\$ 195.00	0.10	\$ 19.50
2/12/2024	Dubs Herschlip	RECEIVE EMAIL FROM COURT REPORTER. EMAIL TO CLIENT. EMAIL TO OC. EMAIL TO CLIENT.	\$ 550.00	0.20	\$ 110.00
2/14/2024	Dubs Herschlip	RECEIVE EMAIL FROM CLIENT. EMAIL OC.	\$ 550.00	0.20	\$ 110.00
2/14/2024	Dubs Herschlip	RECEIVE EMAIL FROM OC. EMAIL TO CLIENT.	\$ 550.00	0.10	\$ 55.00
2/14/2024	Dubs Herschlip	RECEIVE MESSAGE FROM OC. EMAIL TO OC.	\$ 550.00	0.10	\$ 55.00
2/14/2024	Dubs Herschlip	EMAIL TO OC.	\$ 550.00	0.10	\$ 55.00
2/14/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM WA.	\$ 550.00	0.10	\$ 55.00
2/14/2024	William Adan	Prepared and mailed off Errata. Emailed RB	\$ 195.00	0.30	\$ 58.50
2/14/2024	William Adan	Emailed Controller.	\$ 195.00	0.10	\$ 19.50
2/14/2024	William Adan	TC from OC. Emailed DH about TC with OC.	\$ 195.00	0.30	\$ 58.50
2/15/2024	William Adan	Archived filed pleadings	\$ 195.00	0.10	\$ 19.50
2/15/2024	William Adan	Archived filed pleadings	\$ 195.00	0.10	\$ 19.50
2/15/2024	William Adan	Reviewed email from the court. Reviewed filed Docs. Redacted documents. Emailed DH with my research.	\$ 195.00	0.80	\$ 156.00
2/15/2024	William Adan	Emailed RB.	\$ 195.00	0.10	\$ 19.50
2/15/2024	Dubs Herschlip	REVIEW REDACTED DECLARATION APPROVE FOR FILING. RECEIVE AND REPLY TO EMAIL FROM WA.	\$ 550.00	0.40	\$ 220.00
2/15/2024	Dubs Herschlip	RECEIVE AND REVIEW COURT MINUTES SEALING MY DECLARATION. EMAIL WA.	\$ 550.00	0.10	\$ 55.00
2/15/2024	Dubs Herschlip	RECEIVE AND REVIEW MOTION FOR TRIAL CONTINUANCE. EMAIL TO OC.	\$ 550.00	0.30	\$ 165.00
2/15/2024	Rafael Bultz	Reviewed motion for continuance and prepared outline of response to it.	\$ 385.00	2.80	\$ 1,078.00
2/16/2024	Rafael Bultz	Review of amended declaration sent back by court.	\$ 385.00	0.80	\$ 308.00

2/16/2024	Rafael Bultz	Email to Dubs about declaration sent back by the court.	\$ 385.00	0.20	\$ 77.00
2/16/2024	Rafael Bultz	Started drafting motion to amend regarding returned decl. by the court.	\$ 385.00	1.40	\$ 539.00
2/16/2024	Rafael Bultz	Drafted proposed order for motion to continue judgment on the peladings.	\$ 385.00	1.40	\$ 539.00
2/16/2024	Rafael Bultz	Research into drafting motion to amend.	\$ 385.00	1.50	\$ 577.50
2/16/2024	Dubs Herschlip	MEET WITH RB TO ASSIGN TASKS.	\$ 550.00	0.30	\$ 165.00
2/16/2024	William Adan	Reviewed email from RB. 2nd Email reply to RB.	\$ 195.00	0.10	\$ 19.50
2/16/2024	William Adan	3rd email to RB.	\$ 195.00	0.10	\$ 19.50
2/16/2024	William Adan	4th email to RB. Filed docs with the court.	\$ 195.00	0.10	\$ 19.50
2/16/2024	William Adan	Reviewed OC filings. Emailed DH.	\$ 195.00	0.10	\$ 19.50
2/20/2024	William Adan	Meeting with DH, RB and AR.	\$ 195.00	0.10	\$ 19.50
2/20/2024	Dubs Herschlip	TEAMS CALL WITH RB AND WA.	\$ 550.00	0.20	\$ 110.00
2/20/2024	Rafael Bultz	TEAMS meeting with D. Herschlip, A. Rowan, and W. Adan on case status and steps moving forward.	\$ 385.00	0.10	\$ 38.50
2/20/2024	Rafael Bultz	Review and redaction of possible documents court asked to be redacted and re-filed.	\$ 385.00	1.60	\$ 616.00
2/20/2024	Rafael Bultz	Drafted Plaintiff's response to opposing part's motion to continue and the declaration accompanying it.	\$ 385.00	2.90	\$ 1,116.50
2/20/2024	Rafael Bultz	Legal research for response to motion to continue.	\$ 385.00	2.50	\$ 962.50
2/21/2024	Rafael Bultz	Drafted Plaintiff's response to Defendant's motion to continue trial date and declaration of D. Herschlip accompanying it.	\$ 385.00	4.10	\$ 1,578.50
2/21/2024	Rafael Bultz	Continued drafting of proposed order for judgment on the pleadings.	\$ 385.00	1.90	\$ 731.50
2/21/2024	Rafael Bultz	Call with A. Rowan regarding revising order for judgment on the pleadings.	\$ 385.00	0.30	\$ 115.50
2/21/2024	Dubs Herschlip	REVIEW AND REVISE DRAFT PROPOSED ORDER FOR MOTION FOR JUDGMENT ON THE PLEADINGS. RECEIVE AND REPLY TO EMAILS FROM RB.	\$ 550.00	0.20	\$ 110.00
2/21/2024	William Adan	Meet with RB. Filed pleadings. Prep and mailed hard copies to OC's office.	\$ 195.00	0.80	\$ 156.00
2/22/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM RB. APPROVE OF DRAFT PROPOSED ORDER DENYING MOTION TO CONTINUE TRIAL.	\$ 550.00	0.10	\$ 55.00
2/22/2024	Rafael Bultz	Revised draft of response to defendant's motion to continue trial date and decl of D. Herschlip.	\$ 385.00	3.20	\$ 1,232.00
2/22/2024	Rafael Bultz	Call with expert witness Mr. Worth on case update and inclusion of documents in folder he has access to,	\$ 385.00	0.20	\$ 77.00
2/22/2024	Rafael Bultz	Email to expert witness Mr. Worth regarding status of case and inclusion of documents for his review.	\$ 385.00	0.10	\$ 38.50
2/22/2024	Rafael Bultz	Drafted proposed order to deny motion for continuance of trial date.	\$ 385.00	1.10	\$ 423.50
2/22/2024	Alex Rowan	Revising the proposed order granting Plaintiff's motion for judgment on the pleadings.	\$ 350.00	0.30	\$ 105.00
2/23/2024	Rafael Bultz	Review of discovery documents and other documents in file to determine if the documents expert witness Mr. Worth has need to be supplemented.	\$ 385.00	2.00	\$ 770.00
2/23/2024	Rafael Bultz	Call with expert witness Mr. Worth regarding documents he needs for his review and preparation of his report.	\$ 385.00	0.30	\$ 115.50
2/23/2024	William Adan	Emailed the court with proposed orders.	\$ 195.00	0.10	\$ 19.50
2/23/2024	William Adan	Emailed the court. x2	\$ 195.00	0.10	\$ 19.50
2/26/2024	William Adan	Drafted NOU. Emailed DH and AR. SMS with AR. Revised and filed NOU .	\$ 195.00	0.50	\$ 97.50
2/26/2024	William Adan	Meet with DH, AR and RB	\$ 195.00	0.10	\$ 19.50
2/26/2024	Rafael Bultz	Research into protective orders and legal research into courts' determination of confidential materials.	\$ 385.00	3.10	\$ 1,193.50
2/26/2024	Rafael Bultz	TEAMS meeting with D. Herschlip, A. Rowan, and W. Adan on case status and steps moving forward.	\$ 385.00	0.10	\$ 38.50
2/26/2024	Rafael Bultz	Review of draft of new set of Requests for Admission to opposing party.	\$ 385.00	1.30	\$ 500.50
2/26/2024	Dubs Herschlip	EMAIL CLIENT.	\$ 550.00	0.10	\$ 55.00
2/26/2024	Dubs Herschlip	TEAMS CALL WITH RB, AR AND WA.	\$ 550.00	0.20	\$ 110.00
2/26/2024	Alex Rowan	Drafting Requests for Admission	\$ 350.00	1.50	\$ 525.00
2/26/2024	Alex Rowan	Analyzing and reviewing State Farm's file, ONeal_SFCC_000001 - 593, to create requests for production and prepare for trial.	\$ 350.00	1.20	\$ 420.00
2/26/2024	Alex Rowan	Analyzing docket and documents in client folder to create requests for admission	\$ 350.00	0.30	\$ 105.00
2/26/2024	Alex Rowan	Analyzing deposition of D. O'Neal to prepare for trial and create requests for admission.	\$ 350.00	1.10	\$ 385.00
2/26/2024	Alex Rowan	Reviewing and revising requests for admission.	\$ 350.00	0.40	\$ 140.00
2/26/2024	Alex Rowan	Corresponding with partner DH about the Requests for admission.	\$ 350.00	0.10	\$ 35.00
2/26/2024	Alex Rowan	Teams conference with DH, WA, and RB about the Requests for Admission.	\$ 350.00	0.10	\$ 35.00
2/26/2024	Alex Rowan	Reviewing Dubs' NOU for the fall of 2024.	\$ 350.00	0.10	\$ 35.00
2/27/2024	Alex Rowan	Drafting a stipulation to strike a notice of unavailability.	\$ 350.00	0.50	\$ 175.00
2/27/2024	Dubs Herschlip	MEET WITH RB.	\$ 550.00	0.10	\$ 55.00
2/27/2024	Dubs Herschlip	RECEIVE AND REVIEW ORDER CONTINUING TRIAL DATE.	\$ 550.00	0.10	\$ 55.00

2/27/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM COURT WITH RESPONSE TO OUR CR 12(C) MOTION. EMAILS TO AR.	\$ 550.00	0.20	\$ 110.00
2/27/2024	Rafael Bultz	Research into local rules and case law on stipulated protective orders.	\$ 385.00	2.60	\$ 1,001.00
2/27/2024	William Adan	Archived filed Pleadings. Emailed AR.	\$ 195.00	0.10	\$ 19.50
2/27/2024	William Adan	Calendared new trial deadlines.	\$ 195.00	0.30	\$ 58.50
2/28/2024	Rafael Bultz	Call with A. Rowan regarding revisions to stipulated proposed protective order.	\$ 385.00	0.50	\$ 192.50
2/28/2024	Rafael Bultz	Call with A. Rowan, W. Adan, D. Herschlip about case schedule and upcoming tasks.	\$ 385.00	1.00	\$ 385.00
2/28/2024	Rafael Bultz	Review of proposed stipulated protective order regarding discovery documents production.	\$ 385.00	1.80	\$ 693.00
2/28/2024	Rafael Bultz	Call with opposing counsel C. Furman regarding proposed stip order.	\$ 385.00	0.70	\$ 269.50
2/28/2024	Rafael Bultz	Call with D. Herschlip regarding comms with opposing counsel Furman and the proposed stipulated protective order.	\$ 385.00	0.50	\$ 192.50
2/28/2024	Rafael Bultz	Email to opposing counsel C. Furman regarding proposed stip protective order and further negotiations and revisions.	\$ 385.00	1.70	\$ 654.50
2/28/2024	Dubs Herschlip	T.C. WITH RB. REVIEW FILE. DICTATE RESPONSE TO PROPOSED PROTECTIVE ORDER.	\$ 550.00	0.50	\$ 275.00
2/28/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM RB. MEET WITH RB TO DICTATE REVISIONS TO PROTECTIVE ORDER.	\$ 550.00	0.20	\$ 110.00
2/28/2024	Dubs Herschlip	MEET WITH RB AND AR.	\$ 550.00	0.20	\$ 110.00
2/28/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB AND OC.	\$ 550.00	0.10	\$ 55.00
2/28/2024	Dubs Herschlip	T.C. WITH AR, RB AND WA.	\$ 550.00	0.10	\$ 55.00
2/28/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM OC WITH PROPOSED PROTECTIVE ORDER ATTACHED.	\$ 550.00	0.20	\$ 110.00
2/28/2024	Alex Rowan	Teleconference with DH, WA, and RB discussing requests for admission and new court dates.	\$ 350.00	0.20	\$ 70.00
2/28/2024	Alex Rowan	Revising requests for admission.	\$ 350.00	0.30	\$ 105.00
2/28/2024	Alex Rowan	Review the protective order with RB.	\$ 350.00	0.50	\$ 175.00
2/29/2024	Alex Rowan	Drafting a reply in support of Plaintiff's motion for judgment on the pleadings.	\$ 350.00	2.10	\$ 735.00
2/29/2024	Alex Rowan	Researching case law on a judgment on the pleadings.	\$ 350.00	0.70	\$ 245.00
2/29/2024	Alex Rowan	Revising reply in support of Plaintiff's motion for judgment on the pleadings.	\$ 350.00	0.70	\$ 245.00
2/29/2024	Alex Rowan	Corresponding with partner DH and attorney RB about the reply in support of plaintiff's 12(c) motion.	\$ 350.00	0.20	\$ 70.00
2/29/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM WA AND RB.	\$ 550.00	0.10	\$ 55.00
2/29/2024	Dubs Herschlip	REVIEW AND APPROVE EMAIL TO OC WITH PROTECTION ORDER ATTACHED.	\$ 550.00	0.10	\$ 55.00
2/29/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM AR WITH REVISED REPLY ATTACHED.	\$ 550.00	0.10	\$ 55.00
2/29/2024	Dubs Herschlip	RECEIVE AND REVIEW ANOTHER EMAIL FROM OC. MEET WITH RB.	\$ 550.00	0.20	\$ 110.00
2/29/2024	Dubs Herschlip	REVISE EMAIL TO OC RESPONDING TO PROPOSED PROTECTIVE ORDER AND EXTENSION OF DEFENDANT'S DISCOVERY DEADLINE.	\$ 550.00	0.20	\$ 110.00
2/29/2024	Dubs Herschlip	REVIEW AND REVISE REPLY IN SUPPORT OF PLAINTIFF'S CR 12(C) MOTION. EMAIL TO RB, AR AND WA.	\$ 550.00	1.10	\$ 605.00
2/29/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB AND OC. MEET WITH RB TO DICTATE RESPONSE TO OC'S DEMANDS FOR PROTECTIVE ORDER.	\$ 550.00	0.20	\$ 110.00
2/29/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM RB AND AR WITH DRAFTS OF REPLY TO CR 12(C) MOTION ATTACHED.	\$ 550.00	0.10	\$ 55.00
2/29/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM OC. MEET WITH RB.	\$ 550.00	0.30	\$ 165.00
2/29/2024	Rafael Bultz	Emails to opposing counsel C. Furman regarding continued negotiation of the stip proposed protective order.	\$ 385.00	1.00	\$ 385.00
2/29/2024	Rafael Bultz	Calls with opposing counsel C. Furman regarding continued negotiations of stip proposed protective order.	\$ 385.00	0.40	\$ 154.00
2/29/2024	Rafael Bultz	Reviewed and revised our reply to our 12(c) motion.	\$ 385.00	2.10	\$ 808.50
3/1/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM OC, COURT AND WA WITH ATTACHMENTS INCLUDING STIPULATED MOTION FOR RESTRAINING ORDER.	\$ 550.00	0.20	\$ 110.00
3/1/2024	William Adan	Archived Judge's Orders.	\$ 195.00	0.10	\$ 19.50
3/4/2024	Rafael Bultz	Call with expert witness Mr. Worth on needing to meet and list the documents provided to him.	\$ 385.00	0.50	\$ 192.50
3/4/2024	Dubs Herschlip	RECEIVE AND REVIEW COURT SIGNED PROTECTIVE ORDER.	\$ 550.00	0.10	\$ 55.00
3/5/2024	Dubs Herschlip	CONTINUE TO REVISE RFA'S. EMAIL RB.	\$ 550.00	0.40	\$ 220.00
3/5/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM EXPERT.	\$ 550.00	0.10	\$ 55.00
3/5/2024	Dubs Herschlip	TEAMS CALL WITH RB, WA AND AR TO ASSIGN RFA'S AND MOTION TO EXTEND EXPERT DEADLINE.	\$ 550.00	0.30	\$ 165.00
3/5/2024	Dubs Herschlip	REVISE RFA'S.	\$ 550.00	0.30	\$ 165.00
3/5/2024	Dubs Herschlip	EMAIL TO OC. EMAIL TO EXPERT WITNESS.	\$ 550.00	0.10	\$ 55.00
3/5/2024	Rafael Bultz	Revised Requests for Admission (RFAs) to include RFAs for the affirmative defenses.	\$ 385.00	2.10	\$ 808.50
3/5/2024	Rafael Bultz	Legal research and practical guidance on drafting Requests for Admission in WA regarding affirmative actions.	\$ 385.00	1.70	\$ 654.50

3/5/2024	William Adan	Meet with DH, RB and AR.	\$ 195.00	0.10	\$ 19.50
3/5/2024	William Adan	scheduled TC with expert. Replied to expert's email.	\$ 195.00	0.20	\$ 39.00
3/5/2024	William Adan	Archived Discovery Production.	\$ 195.00	0.10	\$ 19.50
3/5/2024	William Adan	Archived Discovery Production.x2	\$ 195.00	0.10	\$ 19.50
3/6/2024	William Adan	Archived Discovery.	\$ 195.00	0.10	\$ 19.50
3/6/2024	Rafael Bultz	Drafting of Requests for Admission.	\$ 385.00	2.50	\$ 962.50
3/6/2024	Rafael Bultz	Call with D. Herschlip about Requests for Admissions revisions.	\$ 385.00	0.20	\$ 77.00
3/6/2024	Rafael Bultz	Call with expert witness Mr. Worth on admissibility of police reports.	\$ 385.00	0.40	\$ 154.00
3/6/2024	Dubs Herschlip	RECEIVE AND REPLY TO TESTS FROM RB. REVIEW REVISED RFA'S. DOCUSIGN.	\$ 550.00	0.20	\$ 110.00
3/6/2024	Dubs Herschlip	DOCUSIGN RFA'S.	\$ 550.00	0.10	\$ 55.00
3/6/2024	Dubs Herschlip	RECEIVE AND REVIEW REVISED RFA'S. T.C. WITH RB. DICTATE REVISIONS.	\$ 550.00	0.20	\$ 110.00
3/6/2024	Dubs Herschlip	T.C. WITH RB.	\$ 550.00	0.20	\$ 110.00
3/6/2024	Dubs Herschlip	T.C. WITH WA AND RB.	\$ 550.00	0.10	\$ 55.00
3/6/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM WA AND RB WITH ATTACHMENTS. REVIEW CORRECTED RESPONSES TO PLAINTIFF'S 2ND DISCOVERY SET.	\$ 550.00	0.20	\$ 110.00
3/6/2024	Dubs Herschlip	RECEIVE AND REVIEW OC'S DISCOVERY PRODUCTION DATED 3/5. REVIEW DISCOVERY. SEND EMAIL TO RB, AR AND WA.	\$ 550.00	0.30	\$ 165.00
3/7/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC.	\$ 550.00	0.10	\$ 55.00
3/7/2024	Dubs Herschlip	RECEIVE AND REVIEW NOTICES FROM COURT. [N.C.]	\$ 550.00	0.10	\$ 55.00
3/7/2024	Dubs Herschlip	REVIEW AND APPROVE PROPOSED ORDER EXTENDING DEADLINE.	\$ 550.00	0.10	\$ 55.00
3/7/2024	Dubs Herschlip	REVIEW AND REVISE DRAFT MOTION TO EXTEND DEADLINE OF EXPERT WITNESS REPORT AND DEC OF RB IN SUPPORT.	\$ 550.00	0.20	\$ 110.00
3/7/2024	Dubs Herschlip	MEET WITH RB.	\$ 550.00	0.10	\$ 55.00
3/7/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM RB WITH ATTACHMENTS.	\$ 550.00	0.10	\$ 55.00
3/7/2024	Rafael Bultz	Legal research into motion to extend deadline.	\$ 385.00	2.30	\$ 885.50
3/7/2024	Rafael Bultz	Drafted motion to extend deadline, Rafael Bultz declaration supporting it, and the proposed order to go with it.	\$ 385.00	5.10	\$ 1,963.50
3/7/2024	William Adan	Calendared deadline for RFA	\$ 195.00	0.10	\$ 19.50
3/8/2024	William Adan	Archived Motion for Summary Judgment.	\$ 195.00	0.10	\$ 19.50
3/8/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS OC'S OBJECTIONS AND OFFER OF 1 WEEK CONTINUANCE OF DEADLINE FOR EXPERT REPORT.	\$ 550.00	0.20	\$ 110.00
3/8/2024	Dubs Herschlip	RECEIVE AND REVIEW ORDER GRANTING PARTIAL SUMMARY JUDGMENT.	\$ 550.00	0.30	\$ 165.00
3/8/2024	Dubs Herschlip	MEET WITH RB.	\$ 550.00	0.20	\$ 110.00
3/11/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM RB.	\$ 550.00	0.10	\$ 55.00
3/11/2024	Dubs Herschlip	REVIEW EMAIL FROM RB. [N.C.]	\$ 550.00	0.10	\$ 55.00
3/11/2024	Dubs Herschlip	MEET WITH RB. REVIEW FILE.	\$ 550.00	0.20	\$ 110.00
3/11/2024	Rafael Bultz	Email to expert witness Mr. Worth about next steps.	\$ 385.00	0.40	\$ 154.00
3/11/2024	Rafael Bultz	Email to opposing counsel C. Furman.	\$ 385.00	0.20	\$ 77.00
3/11/2024	Rafael Bultz	Follow-up email to expert witness Mr. Worth	\$ 385.00	0.10	\$ 38.50
3/12/2024	Rafael Bultz	Call with opposing counsel C. Furman.	\$ 385.00	0.30	\$ 115.50
3/12/2024	Rafael Bultz	Call with expert witness Mr. Worth regarding addition of time for his report.	\$ 385.00	0.40	\$ 154.00
3/12/2024	Rafael Bultz	Follow-up call with opposing counsel C. Furman on the extension of time for expert report.	\$ 385.00	0.20	\$ 77.00
3/12/2024	Rafael Bultz	Call with D. Herschlip to discuss extension of expert report.	\$ 385.00	0.10	\$ 38.50
3/12/2024	Dubs Herschlip	RECEIVE AND REPLY TO TEXTS FROM RB. ANOTHER T.C WITH RB.	\$ 550.00	0.10	\$ 55.00
3/12/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM OC. T.C. WITH RB.	\$ 550.00	0.10	\$ 55.00
3/12/2024	Dubs Herschlip	REVISE EMAIL AFTER RB REVISED. SEND EMAIL TO OC.	\$ 550.00	0.10	\$ 55.00
3/12/2024	Dubs Herschlip	RECEIVE AND REVIEW ANOTHER EMAIL FROM OC. DRAFT REPLY EMAIL. MEET WITH RB.	\$ 550.00	0.20	\$ 110.00
3/12/2024	Dubs Herschlip	EMAIL TO OC REITERATING OUR REQUEST FOR EXTENSION OF THE DISCOVERY DEADLINE FOR FILING PLAINTIFF'S EXPERT REPORT.	\$ 550.00	0.20	\$ 110.00
3/12/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM OC DENYING OUR REQUEST FOR EXTENSION OF THE DISCOVERY DEADLINE FOR FILING PLAINTIFF'S EXPERT REPORT.	\$ 550.00	0.10	\$ 55.00
3/12/2024	William Adan	Meet with RB. Drafted NOA. Emailed RB.	\$ 195.00	0.30	\$ 58.50
3/13/2024	William Adan	Received Email from RB. Revised NOA and filed.	\$ 195.00	0.10	\$ 19.50
3/13/2024	Dubs Herschlip	RECEIVE AND REPLY TO ONE MORE EMAIL FROM RB. [N.C.]	\$ 550.00	0.10	\$ 55.00
3/13/2024	Dubs Herschlip	RECEIVE AND REPLY TO ANOTHER EMAIL FROM RB. REVISE STIP.	\$ 550.00	0.10	\$ 55.00
3/13/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM RAFAEL WITH DRAFT MOTION TO EXTEND DEADLINE STIP & ORDER.	\$ 550.00	0.20	\$ 110.00
3/13/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM RB AND WA.	\$ 550.00	0.10	\$ 55.00

3/13/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB AND WA WITH ATTACHMENTS. REVIEW NOA FOR RB.	\$ 550.00	0.20	\$ 110.00
3/13/2024	Rafael Bultz	Drafted stipulated motion to continue expert witness report deadline.	\$ 385.00	2.10	\$ 808.50
3/13/2024	Rafael Bultz	Revised stipulated motion to continue expert witness report deadline based on D. Herschlip and communication with opposing counsel C. Furman.	\$ 385.00	0.80	\$ 308.00
3/13/2024	Rafael Bultz	Call and email with opposing counsel C. Furman about stip motion to continue expert report deadline.	\$ 385.00	0.40	\$ 154.00
3/13/2024	Rafael Bultz	Call with expert witness Mr. Worth and Commander Johnson at Kent Police Department.	\$ 385.00	0.20	\$ 77.00
3/13/2024	Rafael Bultz	Call with expert witness Mr. Worth about his call with Commander Johnson from the Kent Police Department.	\$ 385.00	0.40	\$ 154.00
3/13/2024	Rafael Bultz	Notes and outline of my call with expert witness Mr. Worth and Commander Johnson from Kent Police Department and how it impacts case strategy and discovery.	\$ 385.00	1.10	\$ 423.50
3/14/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS MEETING WITH EXPERT AND POLICE OFFICER. DICTATE TASKS.	\$ 550.00	0.30	\$ 165.00
3/14/2024	Dubs Herschlip	RECEIVE AND REVIEW ORDER GRANTING EXTENSION OF EXPERT DEADLINE.	\$ 550.00	0.10	\$ 55.00
3/15/2024	Rafael Bultz	Call with expert witness Mr. Worth.	\$ 385.00	0.10	\$ 38.50
3/21/2024	William Adan	Received and archived Judge's orders.	\$ 195.00	0.20	\$ 39.00
3/22/2024	Dubs Herschlip	RECEIVE AND REVIEW ORDER DENYING MOTION FOR JUDGMENT ON THE PLEADINGS. EMAIL TO AR.	\$ 550.00	0.20	\$ 110.00
3/25/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM AR.	\$ 550.00	0.10	\$ 55.00
3/26/2024	Dubs Herschlip	MEET WITH WA. [N.C.]	\$ 550.00	0.10	\$ 55.00
3/28/2024	Dubs Herschlip	T.C. WITH AR TO ASSIGN MOTION FOR SUMMARY JUDGMENT ON DEFENDANT'S AFFIRMATIVE DEFENSES.	\$ 550.00	0.10	\$ 55.00
3/28/2024	Alex Rowan	Discussing drafting a motion for summary judgment with partner DH.	\$ 350.00	0.10	\$ 35.00
4/1/2024	Alex Rowan	Teleconference with DH to discuss case status and next assignments (non-billed).	\$ 350.00	0.10	\$ 35.00
4/1/2024	Dubs Herschlip	MEET WITH WA. [N.C.]	\$ 550.00	0.10	\$ 55.00
4/2/2024	Dubs Herschlip	TEAMS CALL WITH AR, RB AND WA. [N.C.]	\$ 550.00	0.10	\$ 55.00
4/2/2024	Alex Rowan	Teleconference with DH, WA, and RB to discuss a motion for summary judgment.	\$ 395.00	0.10	\$ 39.50
4/2/2024	William Adan	Meet with DH	\$ 195.00	0.10	\$ 19.50
4/5/2024	Alex Rowan	Analyzing responses to requests for admission.	\$ 350.00	1.00	\$ 350.00
4/5/2024	Dubs Herschlip	REVIEW STATE FARM'S RESPONSES AND OBJECTIONS TO OUR RFA'S. EMAIL CLIENT. EMAIL AR.	\$ 550.00	0.50	\$ 275.00
4/8/2024	Alex Rowan	Analyzing State Farm's opposition to Plaintiff's motion for judgment on the pleadings to determine whether further discovery is needed on State Farm's affirmative defenses.	\$ 350.00	0.30	\$ 105.00
4/8/2024	Alex Rowan	teleconference with DH to discuss desirability of discovery and summary judgment.	\$ 350.00	0.10	\$ 35.00
4/8/2024	Alex Rowan	Analyzing the responses to the requests for production, annotating responses, and organizing motion for rule 11 sanctions and for moving to admit.	\$ 350.00	1.20	\$ 420.00
4/9/2024	Alex Rowan	teleconference with DH, WA, and RB (non-billed) to discuss case status.	\$ 350.00	0.10	\$ 35.00
4/9/2024	Rafael Bultz	Notes of voicemails from expert witness Mr. Worth, called and left voicemail with expert witness in return.	\$ 385.00	0.40	\$ 154.00
4/9/2024	Rafael Bultz	Call with expert witness Mr. Worth.	\$ 385.00	0.50	\$ 192.50
4/9/2024	William Adan	Reviewed and replied to email from CS.	\$ 195.00	0.10	\$ 19.50
4/9/2024	William Adan	Reviewed and replied to email from AR.	\$ 195.00	0.10	\$ 19.50
4/9/2024	William Adan	Meet with DH, AR and RB.	\$ 195.00	0.10	\$ 19.50
4/9/2024	William Adan	TC with client. Emailed RB.	\$ 195.00	0.40	\$ 78.00
4/10/2024	William Adan	Meet with DH. Emailed OC Furman.	\$ 195.00	0.20	\$ 39.00
4/10/2024	William Adan	Received and replied to OC Hicks.	\$ 195.00	0.10	\$ 19.50
4/11/2024	William Adan	Emailed OC Hicks.	\$ 195.00	0.10	\$ 19.50
4/12/2024	Rafael Bultz	Review Mr. Worth's expert witness report.	\$ 385.00	2.20	\$ 847.00
4/15/2024	Rafael Bultz	Review of expert witness report draft.	\$ 385.00	1.30	\$ 500.50
4/15/2024	Dubs Herschlip	TEAMS CALL WITH RB, WA AND AR TO DICTATE DISCOVERY CONFERENCE WITH OC, NEW DISCOVERY REQUESTS, AND MOTION FOR SUMMARY JUDGMENT ON AFFIRMATIVE DEFENSES. RECEIVE UPDATES FROM RB.	\$ 550.00	0.30	\$ 165.00
4/15/2024	William Adan	Reviewed and replied to OC Hicks.	\$ 195.00	0.10	\$ 19.50
4/16/2024	William Adan	Received and replied to client. Emailed DH. Archived	\$ 195.00	0.10	\$ 19.50
4/16/2024	Dubs Herschlip	REVIEW EMAIL FROM AR. UPDATE ACTION LIST.	\$ 550.00	0.10	\$ 55.00
4/16/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM EXPERT WITNESS ROBERT WORTH WITH ATTACHMENT.	\$ 550.00	1.20	\$ 660.00
4/16/2024	Dubs Herschlip	TEAMS CALL WITH AR, RB AND WA TO ASSIGN DRAFTING SUBPOENAS TO BANKS, MOTION FOR MORE DEFINITIVE STATEMENT, AND TO DEEM RFA'S AS ADMITTED, AND TRIAL SUBPOENAS INCLUDING DEFENDANT'S SPEAKING AGENTS UNDER 30(B)(6).	\$ 550.00	0.50	\$ 275.00

4/16/2024	Rafael Bultz	Review of expert witness report draft.	\$ 385.00	1.50	\$ 577.50
4/16/2024	Alex Rowan	Teleconference with DH, RB, and WA to discuss case status and upcoming assignments/dates.	\$ 350.00	0.50	\$ 175.00
4/17/2024	Rafael Bultz	Preparation for call with opposing counsel Mr. Hicks regarding affirmative answers and other outstanding issues.	\$ 385.00	1.10	\$ 423.50
4/17/2024	Rafael Bultz	Review of expert witness report draft.	\$ 385.00	2.00	\$ 770.00
4/18/2024	Rafael Bultz	Preparation for call with opposing counsel regarding affirmative defenses and other outstanding issues - reschedule as Mr. Hicks was busy for first meeting.	\$ 385.00	1.10	\$ 423.50
4/18/2024	Rafael Bultz	Discovery conference call with opposing counsel J. Hicks.	\$ 385.00	1.00	\$ 385.00
4/18/2024	Rafael Bultz	Review and grammatical suggested edits of expert witness report of Mr. Worth.	\$ 385.00	4.50	\$ 1,732.50
4/18/2024	Dubs Herschlip	MEET WITH RB TO PREPARE FOR CR 26 CALL WITH OC.	\$ 550.00	0.30	\$ 165.00
4/18/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS OUTCOME OF CR 26 CALL WITH OC.	\$ 550.00	0.20	\$ 110.00
4/19/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS WORK PRODUCT PROTECTIONS OF EXPERT DRAFT REPORTS.	\$ 550.00	0.20	\$ 110.00
4/19/2024	Dubs Herschlip	MEET WITH RB TO REVIEW SOURCES OF LEGAL DUTIES BREACHED BY INSURER.	\$ 550.00	0.10	\$ 55.00
4/19/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS DISCLOSURE OF EXPERT REPORT, COMPLIANCE WITH ELECTRONIC SERVICE AGREEMENT, AND DECLARATION OF MAILING.	\$ 550.00	0.20	\$ 110.00
4/19/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM RB TO OUR EXPERT. [N.C.]	\$ 550.00	0.10	\$ 55.00
4/19/2024	Rafael Bultz	Review of expert witness report of Mr. Worth and highlighted suggested grammatical edits.	\$ 385.00	4.70	\$ 1,809.50
4/19/2024	Rafael Bultz	Call with expert witness Mr. Worth to go over his report and address the suggested grammatical edits.	\$ 385.00	3.50	\$ 1,347.50
4/19/2024	William Adan	Meet with RB. Revised report. Emailed RB.	\$ 195.00	0.80	\$ 156.00
4/19/2024	William Adan	Meet with RB. Emailed R. Worth.	\$ 195.00	0.20	\$ 39.00
4/22/2024	William Adan	Meet with AR. Emailed AR.	\$ 195.00	0.20	\$ 39.00
4/22/2024	Rafael Bultz	Research into correct date of client D. O'Neal's beginning of her policy with State Farm.	\$ 385.00	0.70	\$ 269.50
4/22/2024	Rafael Bultz	Review of opposing side's affirmative defenses and drafting of documents and email to opposing counsel Mr. Hicks regarding these and scheduling a discovery conference.	\$ 385.00	2.30	\$ 885.50
4/22/2024	Dubs Herschlip	RECEIVE AND REVIEW PROTECTIVE ORDER SIGNED BY EXPERT.	\$ 550.00	0.10	\$ 55.00
4/22/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB TO EXPERT AND OC WITH EXPERT REPORT ATTACHED. [N.C.]	\$ 550.00	0.10	\$ 55.00
4/22/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM CLIENT WITH REVISIONS TO EXPERT WITNESS. MEET WITH RB.	\$ 550.00	0.20	\$ 110.00
4/22/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS ACTION LIST, DISCOVERY OUTSTANDING, TELECONFERENCE WITH OC, AND GATHERING EVIDENCE FOR UPCOMING MOTIONS.	\$ 550.00	0.40	\$ 220.00
4/22/2024	Alex Rowan	Drafting first draft of a subpoena for BECU	\$ 350.00	0.20	\$ 70.00
4/22/2024	Alex Rowan	Drafting first draft of a subpoena for All My Sons Friends & Storage	\$ 350.00	0.20	\$ 70.00
4/23/2024	Dubs Herschlip	REVISE SUBPOENAS TO BANKS AND ALL MY SONS. RECEIVE AND REPLY TO EMAIL FROM AR. EMAIL RB.	\$ 550.00	0.30	\$ 165.00
4/23/2024	Dubs Herschlip	REVIEW REVISED SDTS. RECEIVE AND REPLY TO EMAIL FROM RB.	\$ 550.00	0.20	\$ 110.00
4/23/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS DISCOVERY DEADLINES. RECEIVE EMAIL FROM WA TO OC.	\$ 550.00	0.20	\$ 110.00
4/23/2024	Rafael Bultz	Editing of subpoenas going out to client's banks.	\$ 385.00	2.30	\$ 885.50
4/23/2024	William Adan	Emailed RB. Emailed OC Hicks Notices of SDT.	\$ 195.00	0.20	\$ 39.00
4/24/2024	Rafael Bultz	Research of potential mediators for mediation.	\$ 385.00	1.30	\$ 500.50
4/24/2024	Rafael Bultz	Review of notes with opposing counsel J. Hicks and email to opposing counsel regarding our call and setting up a meeting to address their affirmative defenses.	\$ 385.00	1.20	\$ 462.00
4/24/2024	Rafael Bultz	Review of expert report and client file to determine if any amendments to report need to be made.	\$ 385.00	2.50	\$ 962.50
4/24/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM RB. REVISE CR 26 CONFERENCE LETTER TO OC.	\$ 550.00	0.10	\$ 55.00
4/24/2024	Dubs Herschlip	MEET WITH RB TO PREPARE HIM FOR T.C. WITH OC.	\$ 550.00	0.20	\$ 110.00
4/29/2024	Dubs Herschlip	TRAVEL TO AND FROM POST OFFICE TO EXPRESS MAIL SUBPOENAS TO CLIENT'S BECU AND CALIFORNIA BANK.	\$ 550.00	0.40	\$ 220.00
4/30/2024	Dubs Herschlip	DICTATE ASSIGNMENTS TO RB. [N.C.]	\$ 550.00	0.10	\$ 55.00
4/30/2024	Rafael Bultz	Call with expert witness R. Worth regarding questions he had on email received to sign a document.	\$ 385.00	0.10	\$ 38.50
5/1/2024	Rafael Bultz	Researched and started drafting declaration of Commander Johnson.	\$ 385.00	2.20	\$ 847.00
5/1/2024	Rafael Bultz	Edit of declaration of mailing draft.	\$ 385.00	0.20	\$ 77.00
5/1/2024	William Adan	Meet with R.B. Revised Doc for filing. Filed doc with the court.	\$ 195.00	0.50	\$ 97.50
5/2/2024	Dubs Herschlip	T.C. WITH AR TO ASSIGN MOTION TO DEEM RFA'S ADMITTED AND FOR SJ.	\$ 550.00	0.10	\$ 55.00
5/2/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM BECU RE SUBPOENA. EMAIL AR, RB & WA.	\$ 550.00	0.10	\$ 55.00
5/3/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM BECU LEGAL DEPT AND WA REGARDING SDT SERVED.	\$ 550.00	0.10	\$ 55.00

5/3/2024	Dubs Herschlip	T.C. WITH ATTORNEY FOR BECU TO DISCUSS SUBPOENA.	\$ 550.00	0.20	\$ 110.00
5/3/2024	Dubs Herschlip	OPENING ENCRYPTED MESSAGE FROM BECU. REVIEW CANCELED CHECKS. REPLY TO EMAIL REQUESTING COPIES OF CHECKS FOR PAYMENT TO STATE FARM.	\$ 550.00	0.20	\$ 110.00
5/3/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM BECU SUBPOENA DEPARTMENT.	\$ 550.00	0.20	\$ 110.00
5/6/2024	Dubs Herschlip	TEAMS CALL WITH RB, AR AND WA.	\$ 550.00	0.20	\$ 110.00
5/6/2024	Alex Rowan	Teleconference with DH to discuss motion for summary judgment on principal-agent relationship.	\$ 350.00	0.20	\$ 70.00
5/7/2024	Dubs Herschlip	RECEIVE AND REVIEW MORE SUBPOENA PRODUCTION FROM BECU.	\$ 550.00	0.10	\$ 55.00
5/8/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS MSJ ON AFFIRMATIVE DEFENSES.	\$ 550.00	0.10	\$ 55.00
5/8/2024	Dubs Herschlip	RECEIVE AND REPLY TO MORE SECURE EMAILS FROM BECU WITH ATTACHMENTS. REVIEW ATTACHED BANK STATEMENTS AND RECORDS CUSTODIAN DECLARATION.	\$ 550.00	0.60	\$ 330.00
5/10/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS BECU DISCOVERY AND ASSIGN COMMUNICATING SAME TO OC, AS WELL AS INCORPORATING EVIDENCE IN MSJ ON OP'S AFFIRMATIVE DEFENSES	\$ 550.00	0.40	\$ 220.00
5/13/2024	Alex Rowan	Meeting with WA, DH, and RB to discuss the MSJ on the affirmative defenses	\$ 350.00	0.10	\$ 35.00
5/13/2024	William Adan	Meet with DH. Emailed Wescom letter to AR.	\$ 195.00	0.10	\$ 19.50
5/16/2024	Dubs Herschlip	TEXT ASSIGNMENT OF MSJ TO RB.	\$ 550.00	0.10	\$ 55.00
5/20/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS DRAFTING MOTION FOR SUMMARY JUDGMENT.	\$ 550.00	0.20	\$ 110.00
5/20/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS DEPOSITION OF OUR EXPERT AND MOTION FOR SJ.	\$ 550.00	0.20	\$ 110.00
5/20/2024	Rafael Bultz	Draft of Motion for Summary Judgment and proposed order.	\$ 385.00	6.10	\$ 2,348.50
5/20/2024	William Adan	Received emailed from CS about message left for RB. Met and emailed RB.	\$ 195.00	0.10	\$ 19.50
5/21/2024	Rafael Bultz	Finish drafting motion for summary judgment, declaration supporting it, and proposed order.	\$ 385.00	3.10	\$ 1,193.50
5/21/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM OC AND RB SCHEDULING DEPO OF OUR EXPERT. [N.C.]	\$ 550.00	0.10	\$ 55.00
5/21/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB AND OUR EXPERT.	\$ 550.00	0.10	\$ 55.00
5/21/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM RB WITH DRAFT MOTION FOR SJ, DEC ISO, AND PROPOSED ORDER ATTACHED.	\$ 550.00	0.20	\$ 110.00
5/22/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS DISCOVERY ISSUES.	\$ 550.00	0.10	\$ 55.00
5/22/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM OC WITH NOTICE OF DEPO OF GLENN ABBOTT.	\$ 550.00	0.10	\$ 55.00
5/22/2024	Rafael Bultz	Redaction of subpoena documents from BECU.	\$ 385.00	2.30	\$ 885.50
5/23/2024	Rafael Bultz	Call with opposing counsel J. Hicks regarding deposition dates.	\$ 385.00	0.20	\$ 77.00
5/23/2024	Rafael Bultz	Email to opposing counsel J. Hicks regarding what was discussed and deposition dates.	\$ 385.00	0.60	\$ 231.00
5/23/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM OC SETTING DEPOSITION.	\$ 550.00	0.10	\$ 55.00
5/23/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS DISCOVERY AN SETTING DEPOS.	\$ 550.00	0.10	\$ 55.00
5/23/2024	Dubs Herschlip	RECEIVE EMAILS FROM OC. MEET WITH RB RE DISCUSSIONS WITH OC AND EXPERT ON DEPOSITION DATES, EXTENSION OF DISCOVERY DEADLINE, COLLECTION AGAINST MUSE, AND DISCLOSING DISCO TO OC.	\$ 550.00	0.20	\$ 110.00
5/27/2024	Rafael Bultz	Redaction of BECU subpoena results.	\$ 385.00	2.10	\$ 808.50
5/28/2024	Rafael Bultz	Redaction of BECU subpoena results.	\$ 385.00	4.10	\$ 1,578.50
5/28/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB AND OC SCHEDULING DEPOSITIONS. [N.C.]	\$ 550.00	0.10	\$ 55.00
5/28/2024	Dubs Herschlip	MEET WITH RB TO PREPARE FOR DEPOSITIONS OF JOHN MUSE AND GLENN ABBOTT.	\$ 550.00	0.40	\$ 220.00
5/28/2024	Dubs Herschlip	MEET WITH TEAM TO ADJUST ACTION LIST AND ASSIGN TASKS. [N.C.]	\$ 550.00	0.10	\$ 55.00
5/28/2024	Alex Rowan	Meeting with DH to discuss motion for more definite statement or to deem RfAs as admitted, as well as review of the motion for summary judgment.	\$ 395.00	0.20	\$ 79.00
5/28/2024	William Adan	Met with DH. Created a new external file and granted access to OC.	\$ 195.00	0.40	\$ 78.00
5/29/2024	Dubs Herschlip	EMAIL TO AR RE DISCOVERY MOTIONS.	\$ 550.00	0.10	\$ 55.00
5/29/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM AR WITH DIRECTIONS AND TEMPLATES FOR Motion for order determining sufficiency of answers and objections to requests for admission.	\$ 550.00	0.20	\$ 110.00
5/29/2024	Rafael Bultz	Finalizing of redaction of BECU subpoena results.	\$ 385.00	3.60	\$ 1,386.00
5/29/2024	Rafael Bultz	Preparation of deposition of Glenn Abbott and John Muse.	\$ 385.00	4.20	\$ 1,617.00
5/29/2024	Rafael Bultz	Preparation of deposition of Glenn Abbott and John Muse.	\$ 385.00	2.60	\$ 1,001.00
5/30/2024	Rafael Bultz	Preparation of deposition of John Muse.	\$ 385.00	5.20	\$ 2,002.00
5/30/2024	Rafael Bultz	Drive to deposition of John Muse.	\$ 385.00	1.00	\$ 385.00
5/30/2024	Rafael Bultz	Present at deposition of John Muse.	\$ 385.00	1.50	\$ 577.50
5/30/2024	Rafael Bultz	Drive back to office from deposition of John Muse.	\$ 385.00	1.10	\$ 423.50
5/30/2024	Rafael Bultz	Draft of stipulated motion to continue deposition date of rebuttal expert witness and declaration of R. Bultz supporting it.	\$ 385.00	2.40	\$ 924.00
5/30/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM AR ON MOTION FOR DEEMING RFA'S ADMISSIONS AS EVIDENCE.	\$ 550.00	0.20	\$ 110.00
5/30/2024	Dubs Herschlip	MEET WITH RB TO PREPARE HIM FOR DEPOSITION.	\$ 550.00	0.20	\$ 110.00

5/30/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM OC'S ASSISTANT RE SCHEDULING DEPOSITIONS. MEET WITH RB TO DISCUSS GLENN'S UNAVAILABILITY.	\$ 550.00	0.20	\$ 110.00
5/30/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS JOHN MUSE'S COUNTERARGUMENTS, AND NOTICE REQUIREMENTS FOR STORAGE UNITS UNDER RCW 19.150.	\$ 550.00	0.20	\$ 110.00
5/30/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS JOHN MUSE'S FTA AT HIS DEPO, COMMUNICATIONS WITH OC, AND NEXT STEPS.	\$ 550.00	0.20	\$ 110.00
5/30/2024	Dubs Herschlip	TEAMS CALL WITH AR.	\$ 550.00	0.20	\$ 110.00
5/30/2024	Alex Rowan	Researching case law on Fed. R. Civ. P. 26 and 36 in the Western District of Washington and the 9th Circuit	\$ 350.00	1.20	\$ 420.00
5/30/2024	Alex Rowan	Drafting the Motion for Order Determining Sufficiency of Defendant's Answers and Objections	\$ 350.00	1.40	\$ 490.00
5/30/2024	Alex Rowan	Drafting the declaration in support of Motion for Order Determining Sufficiency of Defendant's Answers and Objections	\$ 350.00	2.80	\$ 980.00
5/30/2024	Alex Rowan	Corresponding with partner DH about the RFAs, conference, and motion to deem as admitted.	\$ 350.00	0.30	\$ 105.00
5/31/2024	Alex Rowan	Drafting proposed order	\$ 350.00	1.10	\$ 385.00
5/31/2024	Alex Rowan	Revisions to the motion, declaration, and proposed order.	\$ 350.00	0.60	\$ 210.00
5/31/2024	Alex Rowan	Meeting with partner DH and RB to discuss motion, declaration, and proposed order, and final revisions.	\$ 350.00	1.20	\$ 420.00
5/31/2024	Alex Rowan	Drafting the Declaration in support of the motion for order determining sufficiency of Defendant's answers and objections, and seeking to compel.	\$ 350.00	4.30	\$ 1,505.00
5/31/2024	Alex Rowan	Meeting with partner DH to go over the three categories of responses to requests for admission (those that admit subject to objection, those that deny subject to objection, and those that just don't answer the question) as well as review each request to see if I am missing any requests that are important, or am including requests that are not important.	\$ 350.00	0.50	\$ 175.00
5/31/2024	Alex Rowan	Analyzing all requests for admission and Defendant's responses to determine which qualified admissions or other responses are not worth seeking a motion to compel upon, striking the same from the motion and declaration.	\$ 350.00	0.40	\$ 140.00
5/31/2024	Alex Rowan	Corresponding with partner DH and RB about obtaining certified copies of the criminal conviction of John Muse and the default judgment.	\$ 350.00	0.10	\$ 35.00
5/31/2024	Alex Rowan	Corresponding with partner DH and RB about the declaration, asking for revision, and communicating about next steps.	\$ 350.00	0.20	\$ 70.00
5/31/2024	Alex Rowan	Attaching as exhibit A to the declaration Defendant's responses.	\$ 350.00	0.10	\$ 35.00
5/31/2024	Alex Rowan	Revising the motion	\$ 350.00	1.30	\$ 455.00
5/31/2024	Alex Rowan	Researching case law on federal rule of civil procedure 36(a)(6) and 37(a)(5).	\$ 350.00	0.50	\$ 175.00
5/31/2024	Dubs Herschlip	TEAMS MEETING WITH AR AND DICTATE REVISIONS TO THE MOTION TO DEEM RFA'S AS EVIDENCE AND COMPEL ANSWERS.	\$ 550.00	0.50	\$ 275.00
5/31/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM RB WITH DRAFT MOTION TO CONTINUE DEADLINE FOR EXPERT WITNESS, DEC ISO. MEET WITH RB.	\$ 550.00	0.20	\$ 110.00
5/31/2024	Dubs Herschlip	REVIEW, REVISE AND APPROVE MOTION TO COMPEL RFA RESPONSES OR DEEM RESPONSES AS EVIDENCE AND DECLARATION ISO DISCOVERY MOTION. RECEIVE AND REVIEW EMAILS FROM OC'S ASSISTANT AND RB.	\$ 550.00	0.60	\$ 330.00
5/31/2024	Dubs Herschlip	TEAMS CALL WITH RB AND AR TO REVIEW MOTION AND DECLARATION AND DICTATE REVISIONS. REVIEW LOCAL RULES.	\$ 550.00	1.20	\$ 660.00
5/31/2024	Rafael Bultz	Draft of stipulated motion to continue deposition date of rebuttal expert witness and email communications with opposing counsel to sign it.	\$ 385.00	1.90	\$ 731.50
5/31/2024	Rafael Bultz	Review of documents to be filed for the motion order determining sufficiency of requests for admission and draft of declaration of R. Bultz.	\$ 385.00	2.60	\$ 1,001.00
6/3/2024	Rafael Bultz	Research of Judge Evanson's procedures to address striking of motion.	\$ 385.00	1.40	\$ 539.00
6/3/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM AR AND RB.	\$ 550.00	0.10	\$ 55.00
6/3/2024	Dubs Herschlip	RECEIVE ORDER STRIKING PLAINTIFF'S MOTION TO COMPEL. RESEARCH JUDGE'S CHAMBER PROCEDURES. EMAIL RB.	\$ 550.00	0.40	\$ 220.00
6/4/2024	Dubs Herschlip	TEAMS MEETING WITH AR, RB AND WA TO DISCUSS CASE STATUS UPDATE. [N.C.]	\$ 550.00	0.20	\$ 110.00
6/4/2024	Alex Rowan	Teams meeting with DH, WA, and RB discussing the joint statement for discovery dispute and meet and confer under LCR 37.	\$ 350.00	0.10	\$ 35.00
6/4/2024	Rafael Bultz	Research into Judge Evanson's chamber procedures and start draft of joint statement.	\$ 385.00	2.40	\$ 924.00
6/5/2024	Rafael Bultz	Research into western district federal rules regarding discovery disputes and joint statement.	\$ 385.00	2.50	\$ 962.50
6/5/2024	Rafael Bultz	Draft and email to opposing counsel Pendleton regarding joint statement.	\$ 385.00	0.30	\$ 115.50
6/5/2024	Rafael Bultz	Draft of joint statement in regards to our motion being struck by the court.	\$ 385.00	1.90	\$ 731.50
6/6/2024	Rafael Bultz	Drafting of the joint statement draft.	\$ 385.00	4.90	\$ 1,886.50
6/6/2024	Dubs Herschlip	RECEIVE RB'S DRAFT JSR. EMAIL REVISIONS WITH TEMPLATE ATTACHED.	\$ 550.00	0.20	\$ 110.00
6/10/2024	Dubs Herschlip	MEET WITH WA, RB AND AR TO DISCUSS CASE STATUS AND ASSIGN TASKS. [N.C.]	\$ 550.00	0.10	\$ 55.00

6/17/2024	Dubs Herschlip	TEAMS CALL WITH AR, RB AND WA. ASSIGN RB TO FOLLOW UP ON REQUEST FOR JSR FROM OC, SCHEDULING MEDIATION, PRE-TRIAL CONFERENCE, MOTION FOR SUMMARY JUDGMENT AND EXPERT WITNESS DEPO PREP.	\$ 550.00	0.40	\$ 220.00
6/17/2024	Alex Rowan	Meeting with DH, WA, and RB to discuss mediation, the pretrial conference, and a motion for summary judgment.	\$ 350.00	0.10	\$ 35.00
6/17/2024	Rafael Bultz	Research and beginning of draft of motion to extend discovery deadline for the motion to compel answers to RFAs or deem them as evidence.	\$ 385.00	2.60	\$ 1,001.00
6/17/2024	William Adan	Meet with RB. Emailed Expert witness. TC Expert.	\$ 195.00	0.40	\$ 78.00
6/18/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS PRETRIAL CONFERENCE AND OTHER DEADLINES INVOLVING OC.	\$ 550.00	0.20	\$ 110.00
6/21/2024	Dubs Herschlip	MEET WITH RB.	\$ 550.00	0.10	\$ 55.00
6/21/2024	Rafael Bultz	Review of opposing expert witness report.	\$ 385.00	3.10	\$ 1,193.50
6/23/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC WITH NOTICE OF DEPOSITION OF OUR EXPERT AND REQUEST JOINT STATUS CONFERENCE.	\$ 550.00	0.20	\$ 110.00
6/25/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC SCHEDULING THE PRE-TRIAL CONFERENCE. [N.C.]	\$ 550.00	0.10	\$ 55.00
6/25/2024	Dubs Herschlip	MEET WITH RB RE PRETRIAL CONFERENCE. [N.C.]	\$ 550.00	0.10	\$ 55.00
6/27/2024	Dubs Herschlip	T.C. WITH JIM HICKS.	\$ 550.00	0.50	\$ 275.00
6/27/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS MOTION FOR SJ DUE TOMORROW.	\$ 550.00	0.10	\$ 55.00
6/27/2024	Dubs Herschlip	T.C. WITH RB AND AR TO DICTATE MOTION FOR SJ.	\$ 550.00	0.20	\$ 110.00
6/27/2024	Dubs Herschlip	EMAIL TO OC CONFIRMING DISCUSSION.	\$ 550.00	0.10	\$ 55.00
6/27/2024	Alex Rowan	Analyzing the complaint, answer, and requests for admission in preparation for drafting a motion for summary judgment	\$ 395.00	0.70	\$ 276.50
6/27/2024	Rafael Bultz	Preparation for discovery conference with opposing counsel Hicks.	\$ 385.00	2.60	\$ 1,001.00
6/27/2024	Rafael Bultz	Discovery conference with opposing counsel Hicks and attorney D. Herschlip.	\$ 385.00	0.60	\$ 231.00
6/28/2024	Rafael Bultz	Review, research, and assisting in drafting of Motion for Summary Judgment regarding affirmative defenses.	\$ 385.00	5.10	\$ 1,963.50
6/28/2024	Rafael Bultz	Calls with client about getting more details about money orders she used.	\$ 385.00	0.30	\$ 115.50
6/28/2024	Rafael Bultz	Calls with attorneys A. Rowan and D. Herschlip on drafting of motion for summary judgment.	\$ 385.00	0.50	\$ 192.50
6/28/2024	Rafael Bultz	Review and email to AdvancedOne about the errata sheet and deposition transcript.	\$ 385.00	0.70	\$ 269.50
6/28/2024	Rafael Bultz	Email to opposing counsel regarding withdrawal of affirmative defenses.	\$ 385.00	0.20	\$ 77.00
6/28/2024	Alex Rowan	Researching and analyzing background materials; drafting introduction and procedural history of motion for summary judgment.	\$ 395.00	1.60	\$ 632.00
6/28/2024	Alex Rowan	Analyzing docket and reviewing depositions and evidence to find undisputed facts in support of the draft of the factual history section of motion for summary judgment	\$ 395.00	3.10	\$ 1,224.50
6/28/2024	Alex Rowan	teleconference with RB to discuss meet and confer requirement and local rules of the Western District.	\$ 395.00	0.20	\$ 79.00
6/28/2024	Alex Rowan	Corresponding with partner DH and RB about OC's stipulation for dismissal of affirmative defenses in exchange for not filing MSJ.	\$ 395.00	0.20	\$ 79.00
6/28/2024	Alex Rowan	Discussing the stipulations to dismiss certain affirmative defenses for not filing MSJ and debating arguments on the merits why other affirmative defenses should be included with RB.	\$ 395.00	0.80	\$ 316.00
6/28/2024	Alex Rowan	Discussing with RB and partner DH whether we should accept dismissal of certain affirmative defenses in exchange for not filing a MSJ or whether we should file the MSJ in any event.	\$ 395.00	0.40	\$ 158.00
6/28/2024	Alex Rowan	Drafting the factual history section of the MSJ	\$ 395.00	1.60	\$ 632.00
6/28/2024	Alex Rowan	Outlining legal argument against the affirmative defenses for the MSJ	\$ 395.00	0.80	\$ 316.00
6/28/2024	Alex Rowan	Case law research on the affirmative defenses for the MSJ	\$ 395.00	0.70	\$ 276.50
6/28/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS MOTION FOR SUMMARY JUDGMENT PROCEDURES AND FILING TODAY.	\$ 550.00	0.30	\$ 165.00
6/28/2024	Dubs Herschlip	T.C. WITH AR AND RB TO DISCUSS FACTS OF MSJ.	\$ 550.00	0.50	\$ 275.00
6/28/2024	Dubs Herschlip	MEET WITH RB RE USE OF DEPOSITIONS AND ERRATA.	\$ 550.00	0.10	\$ 55.00
6/28/2024	Dubs Herschlip	MEET WITH RB AND T.C. WITH AR TO DISCUSS MERITS OF MSJ ON AFFIRMATIVE DEFENSES, AS OPPOSED TO OC'S OFFER TO WITHDRAW LIMITED AFFIRMATIVED DEFENSES.	\$ 550.00	0.50	\$ 275.00
6/28/2024	William Adan	TC with expert. Meet with RB.	\$ 195.00	0.10	\$ 19.50
6/28/2024	William Adan	2nd TC with expert, followed up with email to expert.	\$ 195.00	0.20	\$ 39.00
6/29/2024	Alex Rowan	Analyze the expert report of Robert Worth and create spreadsheet with a list of facts and evidence for case strategy and trial preparation.	\$ 395.00	3.40	\$ 1,343.00
6/29/2024	Alex Rowan	Analyze the expert report of Danette Leonhardi, draft a summary thereof for partner DH, and add facts to the case spreadsheet.	\$ 395.00	1.70	\$ 671.50
6/29/2024	Alex Rowan	Edit and revise the summary for partner DH.	\$ 395.00	0.40	\$ 158.00
6/29/2024	Alex Rowan	Corresponding with partner DH about the summary of the expert report of Leonhardi.	\$ 395.00	0.10	\$ 39.50

6/29/2024	Alex Rowan	Noting list of questions to ask client about or look for evidence for in preparation for trial.	\$ 395.00	0.40	\$ 158.00
7/2/2024	Alex Rowan	Meeting with RB to prepare for call with expert Robert Worth.	\$ 395.00	0.20	\$ 79.00
7/2/2024	Alex Rowan	Conference call with expert Robert Worth and RB.	\$ 395.00	1.00	\$ 395.00
7/2/2024	Rafael Bultz	Call with expert witness Robert J. Worth regarding his upcoming deposition.	\$ 385.00	1.40	\$ 539.00
7/2/2024	Rafael Bultz	Preparation for call with expert witness Robert J. Worth about his upcoming deposition.	\$ 385.00	2.10	\$ 808.50
7/3/2024	Rafael Bultz	Review of rebuttal expert witness report and preparation for expert witness deposition.	\$ 385.00	2.30	\$ 885.50
7/3/2024	Dubs Herschlip	T.C. WITH CLIENT TO REVIEW CREDITOR CLAIMS, DISCUSS PROGRESS ON INSURANCE, HOW TO TRANSFER TITLE TO VEHICLE, TO OFFER THE LOST WILL, AND HOW TO TRANSFER TITLE TO REAL PROPERTY. RECEIVE AND REPLY TO EMAILS FROM CLIENTS.	\$ 550.00	0.10	\$ 55.00
7/5/2024	William Adan	Meet with RB. Received FAX from expert witness. Saved to client file. Emailed RB.	\$ 195.00	0.30	\$ 58.50
7/8/2024	Tracy Pearson	Discussed case status during team meeting.	\$ 595.00	0.10	\$ 59.50
7/8/2024	Dubs Herschlip	T.C. WITH AR, TP, RB AND WA TO ASSIGN STIPULATED ORDER OF DISMISSAL, REVIEW EXPERT WITNESS DEPO PREP AND OTHER ISSUES.	\$ 550.00	0.30	\$ 165.00
7/8/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM AR WITH SUMMARY OF OP'S EXPERT OPINION.	\$ 550.00	0.10	\$ 55.00
7/8/2024	Dubs Herschlip	MEET WITH RB. REPLY TO EMAIL FROM OC.	\$ 550.00	0.10	\$ 55.00
7/8/2024	Alex Rowan	Meeting with RB to prepare for meeting with expert Mr. Worth.	\$ 395.00	0.40	\$ 158.00
7/8/2024	Rafael Bultz	Email communication to opposing counsel asking for the affirmative defenses stipulation.	\$ 385.00	0.30	\$ 115.50
7/8/2024	Rafael Bultz	Review of stipulated motion regarding affirmative defenses.	\$ 385.00	1.50	\$ 577.50
7/8/2024	Rafael Bultz	Prep for Robert J. Worth expert witness deposition with attorney A. Rowan.	\$ 385.00	0.40	\$ 154.00
7/9/2024	Rafael Bultz	Call with expert witness Robert J. Worth and attorney A. Rowan regarding upcoming deposition for Mr. Worth.	\$ 385.00	1.60	\$ 616.00
7/9/2024	Rafael Bultz	Preparation or call with expert witness Robert J. Worth regarding his upcoming deposition.	\$ 385.00	1.90	\$ 731.50
7/9/2024	Alex Rowan	Preparing before call with expert Robert Worth	\$ 395.00	0.50	\$ 197.50
7/9/2024	Alex Rowan	Conference call with Expert Witness Robert Worth in preparation for deposition on Friday.	\$ 395.00	1.30	\$ 513.50
7/9/2024	Alex Rowan	Discussing whether expert's notes need to be disclosed or not under Fed. R. Civ. P. 26(b)(4)(C).	\$ 395.00	0.20	\$ 79.00
7/9/2024	Dubs Herschlip	RECEIVE AND REVIEW FAX FROM EXPERT WITNESS WITH HANDWRITTEN NOTES. EMAIL RB ASSIGNMENT OF SUPPLEMENTING DISCOVERY REQUEST WITH EXPERT WITNESS' NOTES AND CORRESPONDENCE.	\$ 550.00	0.30	\$ 165.00
7/9/2024	Dubs Herschlip	REVIEW SUMMARY OF OC'S EXPERT REPORT. EMAIL TO AR AND RB ASSIGNMENTS.	\$ 550.00	0.40	\$ 220.00
7/9/2024	Dubs Herschlip	TEAMS CALL WITH RB AND AR TO DISCUSS MEETING WITH ROBERT WORTH. REVIEW FILE.	\$ 550.00	0.20	\$ 110.00
7/9/2024	William Adan	Meet DH. TC with client. Scheduled TC.	\$ 195.00	0.30	\$ 58.50
7/9/2024	William Adan	Meet with RB. Received fax from witness. Emailed RB. Saved discovery production to file.	\$ 195.00	0.30	\$ 58.50
7/10/2024	William Adan	Received multiple faxes from witness. Emailed RB. Saved discovery production to file.	\$ 195.00	0.30	\$ 58.50
7/10/2024	William Adan	Meet with RB. Revised document and sent it back for review to RB.	\$ 195.00	0.30	\$ 58.50
7/10/2024	William Adan	Reviewed more production from witness. Emailed RB.	\$ 195.00	0.20	\$ 39.00
7/10/2024	William Adan	Meet with RB. Revised pleading and sent it back for attorney review.	\$ 195.00	0.30	\$ 58.50
7/10/2024	William Adan	Meet with RB. Sent shared file to witness.	\$ 195.00	0.30	\$ 58.50
7/10/2024	William Adan	Meet with RB. Sent shared file to OC.	\$ 195.00	0.10	\$ 19.50
7/10/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS OBJECTIONS TO DISCOVERY RE EXPERT. RECEIVE AND REVIEW FAXES FROM EXPERT.	\$ 550.00	0.30	\$ 165.00
7/10/2024	Dubs Herschlip	MEET WITH RB AND WA TO DISCUSS FORMAT OF DOCUMENT PRODUCTION.	\$ 550.00	0.10	\$ 55.00
7/10/2024	Dubs Herschlip	RECEIVE AND REPLY TO TEXTS AND EMAILS FROM RB WITH PROPOSED SUPPLEMENTAL DISCOVERY TO OC. T.C. WITH RB. X3	\$ 550.00	0.50	\$ 275.00
7/10/2024	Rafael Bultz	Review of documents to provide for supplemental production to opposing party.	\$ 385.00	1.10	\$ 423.50
7/10/2024	Rafael Bultz	Drafting of supplemental production response.	\$ 385.00	5.10	\$ 1,963.50
7/10/2024	Rafael Bultz	Call with expert witness Robert J. Worth about his upcoming deposition.	\$ 385.00	0.60	\$ 231.00
7/11/2024	Rafael Bultz	Call client D. O'Neal and expert witness Robert J. Worth in preparation for Mr. Worth's deposition.	\$ 385.00	2.90	\$ 1,116.50
7/11/2024	Rafael Bultz	Preparation for defending expert witness in his deposition for 7/12.	\$ 385.00	3.40	\$ 1,309.00
7/11/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM WA AND RB TO OC AND EXPERT IN PREPARATION FOR DEPOSITION TOMORROW.	\$ 550.00	0.20	\$ 110.00
7/11/2024	Dubs Herschlip	MEET WITH RB TO FOLLOW UP ON STIPULATED DISMISSAL OF AFFIRMATIVE DEFENSES.	\$ 550.00	0.10	\$ 55.00
7/11/2024	Alex Rowan	Call with expert Mr. Worth, client Debra O'Neal, and attorney RB.	\$ 395.00	2.90	\$ 1,145.50
7/11/2024	William Adan	Received email from OC. Resent production link to OC. Emailed follow up to OC.	\$ 195.00	0.30	\$ 58.50

7/11/2024	William Adan	Meet with RB. TC with witness. Emailed RB.	\$ 195.00	0.30	\$ 58.50
7/11/2024	William Adan	TC with client. Emailed RB with my client call notes.	\$ 195.00	0.30	\$ 58.50
7/12/2024	Alex Rowan	Preparing for deposition of Robert J. Worth	\$ 395.00	1.00	\$ 395.00
7/12/2024	Alex Rowan	Deposition of Robert J. Worth	\$ 395.00	7.70	\$ 3,041.50
7/12/2024	Dubs Herschlip	MEET WITH RB AND AR TO PREPARE RB FOR DEFENDING DEPOSITION OF EXPERT ROBERT WORTH.	\$ 550.00	0.60	\$ 330.00
7/12/2024	Dubs Herschlip	MEET WITH RB WHILE CALLING AR, AND THEN AGAIN WHILE CALLING EXPERT WITNESS DURING BREAK IN DEPOSITION.	\$ 550.00	0.30	\$ 165.00
7/12/2024	Dubs Herschlip	RECEIVE AND REPLY TO TEXTS FROM AR AND RB.	\$ 550.00	0.20	\$ 110.00
7/12/2024	Dubs Herschlip	MEET WITH RB AND AR TO DISCUSS REHABILITATING EXPERT AS TO QUALIFICATIONS ON INSURANCE FAIR CONDUCT.	\$ 550.00	0.30	\$ 165.00
7/12/2024	Rafael Bultz	Final preparation for defending expert witness in his deposition.	\$ 385.00	2.60	\$ 1,001.00
7/12/2024	Rafael Bultz	Defending deposition of expert witness Robert J. Worth.	\$ 385.00	8.70	\$ 3,349.50
7/12/2024	Rafael Bultz	Call with opposing counsel J. Hicks regarding deposition and affirmative defenses previously agreed to dismiss.	\$ 385.00	0.60	\$ 231.00
7/15/2024	Rafael Bultz	Email to expert witness Mr. Worth regarding his invoice for the deposition.	\$ 385.00	0.30	\$ 115.50
7/15/2024	Rafael Bultz	Call with attorney A. Rowan to discuss the offer of opposing counsel and potential incoming motion to disqualify our expert.	\$ 385.00	0.40	\$ 154.00
7/15/2024	Rafael Bultz	Meeting with attorney D. Herschlip regarding the potential incoming motion to disqualify our expert.	\$ 385.00	0.30	\$ 115.50
7/15/2024	Rafael Bultz	Email communications with opposing counsel regarding agreement and meeting.	\$ 385.00	0.50	\$ 192.50
7/15/2024	Dubs Herschlip	TEAMS CALL WITH TP, RB AND WA TO DISCUSS CASE ASSIGNMENTS.	\$ 550.00	0.30	\$ 165.00
7/15/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS FOLLOW UP WITH OC ON SETTLEMENT. REVISE EMAIL TO OC.	\$ 550.00	0.30	\$ 165.00
7/15/2024	Alex Rowan	Meeting to discuss offer of opposing counsel and potential incoming motion to disqualify expert with attorney RB.	\$ 395.00	0.40	\$ 158.00
7/15/2024	William Adan	Meet with DH and RB. Emailed attorney Hatcher.	\$ 195.00	0.20	\$ 39.00
7/15/2024	Tracy Pearson	Discussed strategy at weekly case status meeting.	\$ 595.00	0.10	\$ 59.50
7/16/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM WA AND CLIENT. [N.C.]	\$ 550.00	0.10	\$ 55.00
7/16/2024	Dubs Herschlip	TEAMS CALL WITH WITNESS AUSTIN HATCHER AND RB.	\$ 550.00	0.50	\$ 275.00
7/16/2024	Dubs Herschlip	REPLY TO EMAIL FROM RB REGARDING DEPOSITION COSTS.	\$ 550.00	0.10	\$ 55.00
7/16/2024	Dubs Herschlip	RECEIVE AND REVIEW MORE EMAILS FROM RB, EXPERT BOB WORTH AND OC'S ASSISTANT. X5	\$ 550.00	0.20	\$ 110.00
7/16/2024	Rafael Bultz	Meeting with former attorney on the case Austin Hatcher about police report filed in this case.	\$ 385.00	0.50	\$ 192.50
7/16/2024	Rafael Bultz	Call with expert witness Robert Worth regarding his recently done deposition.	\$ 385.00	0.40	\$ 154.00
7/22/2024	Rafael Bultz	Draft of subpoena ducus tecus for VONS.	\$ 385.00	2.60	\$ 1,001.00
7/22/2024	Rafael Bultz	TEAMS meeting with Seattle office to discuss status of case and next steps.	\$ 385.00	0.10	\$ 38.50
7/22/2024	Dubs Herschlip	TEAMS MEETING WITH WA, RB, AR AND TP TO DISCUSS CASE ASSIGNMENTS, NEXT STEPS AND DEADLINES.	\$ 550.00	0.30	\$ 165.00
7/22/2024	Alex Rowan	Discussing subpoena draft with associate RB.	\$ 395.00	0.10	\$ 39.50
7/22/2024	William Adan	Meet with RB. Emailed SDT to RB.	\$ 195.00	0.20	\$ 39.00
7/22/2024	William Adan	Meet with RB. Emailed SDT to RB.	\$ 195.00	0.20	\$ 39.00
7/23/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM RB WITH DRAFT SDT ATTACHED.	\$ 550.00	0.20	\$ 110.00
7/23/2024	Rafael Bultz	Research into who to serve with subpoena ducus tecus for obtaining documents regarding money orders that client D. O'neal had used to pay for storage.	\$ 385.00	1.50	\$ 577.50
7/24/2024	Rafael Bultz	Finalized drafting of subpoena ducus tecus to VONS.	\$ 385.00	2.20	\$ 847.00
7/25/2024	Rafael Bultz	Email to opposing counsel Hicks regarding Mr. Worth's deposition transcript cost.	\$ 385.00	0.10	\$ 38.50
7/25/2024	Dubs Herschlip	MEET WITH RB. REVIEW AND APPROVE EMAIL TO OC.	\$ 550.00	0.10	\$ 55.00
7/26/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS CLIENT COSTS.	\$ 550.00	0.20	\$ 110.00
7/26/2024	Rafael Bultz	Consultation with attorney D. Herschlip on client costs.	\$ 385.00	0.20	\$ 77.00
7/26/2024	Rafael Bultz	Email to client regarding cost of expert witness transcript.	\$ 385.00	0.10	\$ 38.50
7/29/2024	Rafael Bultz	Research into process of filing a public records request with Attorney General office, kent police department, and other relevant entities.	\$ 385.00	1.90	\$ 731.50
7/29/2024	Rafael Bultz	TEAMS meeting with Seattle office to discuss status of case and next steps.	\$ 385.00	0.10	\$ 38.50
7/29/2024	Dubs Herschlip	TEAMS CALL WITH TP, AR, RB AND WA TO DISCUSS NEXT STEPS. [N.C.]	\$ 550.00	0.10	\$ 55.00
7/29/2024	William Adan	Meet with DH. Revised SDT. Emailed RB	\$ 195.00	0.50	\$ 97.50
7/29/2024	William Adan	Meet with RB. 2nd email to RB.	\$ 195.00	0.20	\$ 39.00
7/29/2024	Tracy Pearson	Meet and confer regarding case status and strategy during weekly meeting.	\$ 595.00	0.10	\$ 59.50
7/30/2024	William Adan	Revised SDT for vons. Emailed RB for review.	\$ 195.00	0.70	\$ 136.50
7/30/2024	William Adan	Revised SDT for Albertson's Co. Emailed RB for review.	\$ 195.00	0.60	\$ 117.00
7/30/2024	Dubs Herschlip	MEET WITH WA TO DICTATE PREPARATION OF TRIAL EXHIBITS.	\$ 550.00	0.20	\$ 110.00

7/30/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM WA WITH SDT'S ATTACHED.	\$ 550.00	0.10	\$ 55.00
7/30/2024	Dubs Herschlip	MEET WITH RB AND WA.	\$ 550.00	0.10	\$ 55.00
7/30/2024	Rafael Bultz	Revising subpoena ducus tecus sent out to VONS.	\$ 385.00	0.90	\$ 346.50
7/30/2024	Rafael Bultz	Call with client D. O'Neal regarding information about the money orders she used to fill out.	\$ 385.00	0.10	\$ 38.50
7/30/2024	Rafael Bultz	Call with Albertsons Companies corporate to obtain address information for their legal department.	\$ 385.00	0.80	\$ 308.00
7/31/2024	Rafael Bultz	Email to opposing counsel regarding case status and outstanding issues.	\$ 385.00	0.80	\$ 308.00
7/31/2024	Rafael Bultz	Revisions to email to opposing counsel regarding case status and outstanding issues.	\$ 385.00	0.50	\$ 192.50
7/31/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM WA TO OC.	\$ 550.00	0.10	\$ 55.00
7/31/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS CALL WITH CLIENT, AND NEXT STEPS WITH OC.	\$ 550.00	0.30	\$ 165.00
7/31/2024	Dubs Herschlip	REVISE EMAIL TO OC REQUESTING STIPULATION, MEDIATION. APPROVAL OF MEDIATORS AND SETTLEMENT.	\$ 550.00	0.30	\$ 165.00
8/2/2024	Alex Rowan	Discussing the dismissal of affirmative defenses and opposing counsel's response with associate RB.	\$ 395.00	0.30	\$ 118.50
8/2/2024	Rafael Bultz		\$ 385.00	0.50	\$ 192.50
8/2/2024	Rafael Bultz	Prepare for call with opposing counsel James Hicks regarding affirmative defenses, mediation, and \$100,000 judgment.	\$ 385.00	1.10	\$ 423.50
8/2/2024	Rafael Bultz	Legal research into statutes regarding confidentiality and attorney-client privileges that would be applicable in the case.	\$ 385.00	1.60	\$ 616.00
8/2/2024	Rafael Bultz		\$ 385.00	0.40	\$ 154.00
8/2/2024	Rafael Bultz	Email to former attorney on this case Austin Hatcher to confirm his contact information.	\$ 385.00	0.20	\$ 77.00
8/2/2024	Rafael Bultz	Emails with opposing counsel James Hicks regarding action items discussed in earlier meeting that day.	\$ 385.00	0.30	\$ 115.50
8/2/2024	William Adan	Meet with RB. Archived received court documents. Calendared response deadlines.	\$ 195.00	0.30	\$ 58.50
8/5/2024	William Adan	Meet with RB. Archived recent court filings.	\$ 195.00	0.20	\$ 39.00
8/5/2024	Rafael Bultz	Reviewed subpoenas ducus tecus to VONS and ALBERTSONS COMPANIES.	\$ 385.00	0.30	\$ 115.50
8/5/2024	Rafael Bultz		\$ 385.00	3.20	\$ 1,232.00
8/6/2024	Rafael Bultz	Revisions of the supplemental discovery responses draft.	\$ 385.00	1.20	\$ 462.00
8/6/2024	Rafael Bultz	Email to opposing counsel with supplemental discovery response and former attorney on the case Austin Hatcher's contact information.	\$ 385.00	0.20	\$ 77.00
8/6/2024	Alex Rowan	Call with associate RB to discuss supplemental responses to State Farm's discovery requests.	\$ 395.00	0.10	\$ 39.50
8/6/2024	Alex Rowan	Reviewing State Farm's discovery requests, Plaintiff's responses, and proposed supplemental responses.	\$ 395.00	0.40	\$ 158.00
8/6/2024	William Adan	Met with RB. Emailed follow up response to RB.	\$ 195.00	0.10	\$ 19.50
8/8/2024	Alex Rowan	Researching case law on dismissal of affirmative defenses.	\$ 395.00	0.80	\$ 316.00
8/8/2024	Alex Rowan	Researching case law on prejudicial effect of dismissal of affirmative defenses.	\$ 395.00	0.50	\$ 197.50
8/9/2024	Rafael Bultz	Call with expert witness Robert Worth regarding his deposition's transcript.	\$ 385.00	0.20	\$ 77.00
8/9/2024	William Adan	Meet with AR, TP and RB	\$ 195.00	0.10	\$ 19.50
8/12/2024	Rafael Bultz	Started organizing matter files in preparation for designating them for exhibits at trial.	\$ 385.00	2.60	\$ 1,001.00
8/13/2024	Rafael Bultz	Call with expert witness Robert Worth regarding what was discussed in my call with him on July 16, 2024.	\$ 385.00	0.20	\$ 77.00
8/14/2024	Alex Rowan	Meeting RB to discuss response to be drafted to opposing counsel's motion to extend a deadline.	\$ 395.00	0.10	\$ 39.50
8/14/2024	Alex Rowan	Revising response to defendant's motion to extend deadline to challenge expert testimony and the declaration in support thereof.	\$ 395.00	0.90	\$ 355.50
8/14/2024	Alex Rowan	Meeting with RB to discuss the revisions made to the declaration and response, as well as further edits to be made.	\$ 395.00	0.40	\$ 158.00
8/14/2024	Rafael Bultz	Review of all documents in case and organizing needed documents as exhibits for trial.	\$ 385.00	1.30	\$ 500.50
8/14/2024	Rafael Bultz	Drafting of response to opposing party's motion to continue deadline to challenge our expert witnesses' deposition testimony.	\$ 385.00	3.50	\$ 1,347.50
8/14/2024	Rafael Bultz	Drafting of declaration going with our response to opposing party's motion to continue deadline to challenge our expert witnesses' deposition testimony.	\$ 385.00	0.90	\$ 346.50
8/14/2024	Rafael Bultz		\$ 385.00	0.50	\$ 192.50
8/14/2024	William Adan	Revised response, declaration and proposed order. Emailed RB for review and approval.	\$ 195.00	0.40	\$ 78.00
8/14/2024	William Adan	Filed response, declaration and proposed order. Emailed OC, and emailed proposed order to judge's clerk.	\$ 195.00	0.40	\$ 78.00
8/15/2024	William Adan	Met with RB. Troubleshoot with WDW website for client filing.	\$ 195.00	0.20	\$ 39.00
8/15/2024	William Adan	Received documents from the court. Emailed DH.	\$ 195.00	0.20	\$ 39.00

8/16/2024	Rafael Bultz	Legal and judicial research into motions to compel mediation and what our assigned Judge has decided on previous motions.	\$ 385.00	1.60	\$ 616.00
8/16/2024	Rafael Bultz	Email to opposing counsel following up on choice of mediator.	\$ 385.00	0.10	\$ 38.50
8/16/2024	Rafael Bultz	Call with attorney A. Rowan about prepping trial materials and case strategy for trial.	\$ 385.00	0.50	\$ 192.50
8/16/2024	Rafael Bultz	Call with attorney A. Rowan about exhibits and where our arguments need to be bolstered.	\$ 385.00	0.50	\$ 192.50
8/16/2024	Rafael Bultz	Call with attorney A. Rowan about drafting motion to compel mediation.	\$ 385.00	0.50	\$ 192.50
8/16/2024	Alex Rowan	Call with R. Bultz to discuss planning organization of exhibits and moving forward with mediation despite opposing counsel's efforts to dodge answering.	\$ 395.00	0.50	\$ 197.50
8/16/2024	Alex Rowan	Reviewing expert witness's billing entries for mistakes.	\$ 395.00	0.40	\$ 158.00
8/16/2024	Alex Rowan	Correspondence with partner D. Herschlip on bringing a motion to compel mediation.	\$ 395.00	0.20	\$ 79.00
8/16/2024	Alex Rowan	Corresponding with associate R. Bultz on weaknesses and strengths of the case and where exhibits are needed to bolster arguments.	\$ 395.00	0.30	\$ 118.50
8/16/2024	Alex Rowan	Discussing case strategy and witness preparation with associate R. Bultz.	\$ 395.00	0.20	\$ 79.00
8/16/2024	Alex Rowan	Researching what motion to bring in order to induce mediation when no standing order exists compelling mediation.	\$ 395.00	0.60	\$ 237.00
8/19/2024	Alex Rowan	Discussing motion to compel mediation and trial preparation	\$ 395.00	0.30	\$ 118.50
8/19/2024	Dubs Herschlip	TEAMS MEETING WITH TP, AR, RB AND WA TO DISCUSS CASE STATUS AND NEXT STEPS INCLUDING SCHEDULING MEDIATION, OPPOSING ANTICIPATED MOTION TO DISQUALIFY OUR EXPERT, TRIAL PREPARATION AND MOTIONS IN LIMINE.	\$ 550.00	0.40	\$ 220.00
8/19/2024	Rafael Bultz	Review of expert witness Robert Worth's invoice for his services thus far for accuracy and any discrepancies.	\$ 385.00	1.90	\$ 731.50
8/19/2024	Rafael Bultz	Drafting of memo to D. Herschlip and DBL regarding current and future expenses on client file.	\$ 385.00	1.20	\$ 462.00
8/19/2024	Rafael Bultz	Email to Lexitas (ones with a transcript from Mr. Worth deposition) letting them know we were erroneously given access to transcript copy.	\$ 385.00	0.20	\$ 77.00
8/19/2024	Rafael Bultz	Legal research into the potential for filing a motion to compel mediation.	\$ 385.00	2.50	\$ 962.50
8/19/2024	Rafael Bultz	Email to Lexitas (deposition transcript holders) regarding not being charged for a copy of the transcript.	\$ 385.00	0.50	\$ 192.50
8/19/2024	Tracy Pearson	Meet and confer regarding matter and strategize next steps.	\$ 595.00	0.20	\$ 119.00
8/19/2024	William Adan	Received Judge Evans' orders. Emailed RB.	\$ 195.00	0.10	\$ 19.50
8/19/2024	William Adan	Meet with RB. Revised email to Abigail Vaca.	\$ 195.00	0.10	\$ 19.50
8/20/2024	William Adan	Met with DH and RB. Emailed Mr. Worth.	\$ 195.00	0.20	\$ 39.00
8/20/2024	Rafael Bultz	Drafting of motion to compel mediation.	\$ 385.00	3.80	\$ 1,463.00
8/20/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM RB WITH MEMO ON BOB WORTH'S COSTS. EMAIL TO CONTINGENCY COMMITTEE. EMAIL BOB WORTH.	\$ 550.00	0.30	\$ 165.00
8/20/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB TO OC REGARDING SCHEDULING MEDIATION, THE JUDGMENT AGAINST JOHN MUSE, AND THE RESPONDING TO THE REQUEST FOR MEDIATION; AS WELL AS EMAILS TO AND FROM AUSTIN HATCHER CONFIRMING HIS ADDRESS FOR OC'S REQUEST TO DEPOSE HIM.	\$ 550.00	0.20	\$ 110.00
8/20/2024	Dubs Herschlip	RECEIVE AND REPLY TO MORE EMAILS FROM COURTLAND, EXPERT AND WA.	\$ 550.00	0.10	\$ 55.00
8/20/2024	Alex Rowan	Discussing motion to compel with associate R. Bultz.	\$ 395.00	0.20	\$ 79.00
8/21/2024	Dubs Herschlip	REVIEW EMAILS FROM RB AND COURT REPORTER ABOUT LACK OF AUTHORIZATION TO AFFORD THE TRANSCRIPT, AND THE JUDGE'S ORDER GRANTING EXTENSION OF THE DEADLINE TO CHALLENGE OUR EXPERT'S QUALIFICATIONS.	\$ 550.00	0.20	\$ 110.00
8/21/2024	Rafael Bultz	Drafted motion to compel, declaration for R. Bultz, and declaration for D. Herschlip.	\$ 385.00	2.10	\$ 808.50
8/21/2024	Rafael Bultz	Review of all documents in case and organizing needed documents as exhibits for trial.	\$ 385.00	1.20	\$ 462.00
8/21/2024	William Adan	Emailed Mr. Worth to schedule TC with DH.	\$ 195.00	0.10	\$ 19.50
8/22/2024	Dubs Herschlip	MEET WITH RB TO REVIEW FACTS IN CASE FILE REGARDING MEDIATION DISCUSSIONS WITH OC TO DICTATE FACTS FOR MY DECLARATION ISO MOTION TO COMPEL MEDIATION.	\$ 550.00	0.40	\$ 220.00
8/23/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS, COURT FILINGS AND ORDER REGARDING OC'S MOTION TO EXTEND DEADLINE. RECEIVE AND REVIEW ABLERTSON'S SUBPOENA RESULTS. MEET WITH RB TO ASSIGN SUBPOENA TO WESTERN UNION.	\$ 550.00	0.40	\$ 220.00
8/23/2024	Dubs Herschlip	T.C. WITH EXPERT.	\$ 550.00	1.20	\$ 660.00
8/23/2024	Rafael Bultz	Review of expert witness Robert Worth invoice and prepared notes for subsequent call with him about his bill.	\$ 385.00	1.50	\$ 577.50
8/23/2024	Rafael Bultz	Email to paralegal W. Adan and D. Herschlip about the need to send another subpoena duces tecus to Western Union this time.	\$ 385.00	0.10	\$ 38.50
8/23/2024	Rafael Bultz	Call with expert witness Robert Worth and D. Herschlip about Mr. Worth's bill.	\$ 385.00	1.20	\$ 462.00
8/26/2024	Rafael Bultz	Meeting with attorney A. Rowan to discuss case timeline and potential exhibits for trial.	\$ 385.00	0.30	\$ 115.50
8/26/2024	Rafael Bultz	Continued drafting of motion to compel and declarations for R. Bultz and D. Herschlip, as well as proposed order.	\$ 385.00	3.30	\$ 1,270.50

8/26/2024	Rafael Bultz	Review of witness disclosures filed in case and whether it needs to be amended.	\$ 385.00	0.30	\$ 115.50
8/26/2024	Rafael Bultz	Drafting of subpoena decus tecus for Western Union and accompanying documents.	\$ 385.00	0.90	\$ 346.50
8/26/2024	Rafael Bultz	Email to W. Adan and D. Herschlip with the subpoena and associated documents drafts.	\$ 385.00	0.10	\$ 38.50
8/26/2024	Rafael Bultz	Multiple calls with different departments at Western Union corporate to obtain the contact information for serving a subpoena.	\$ 385.00	0.60	\$ 231.00
8/26/2024	Rafael Bultz	Email to law enforcement subpoena department at Western Union corporate to determine contact for serving subpoena.	\$ 385.00	0.30	\$ 115.50
8/26/2024	Dubs Herschlip	MEET WITH RB. TEXT AR ASSIGNMENT OF PREPARING TRIAL EXHIBITS LIST.	\$ 550.00	0.20	\$ 110.00
8/26/2024	Dubs Herschlip	MEET WITH RB TO FOLLOW UP ON SUBPOENA TO WESTERN UNION.	\$ 550.00	0.10	\$ 55.00
8/26/2024	Dubs Herschlip	REVIEW, REVISE AND APPROVE SUBPOENA TO WESTERN UNION.	\$ 550.00	0.20	\$ 110.00
8/26/2024	Dubs Herschlip	EMAILS TO THE CONTINGENCY COMMITTEE AND THE CLIENT FOR COSTS.	\$ 550.00	0.30	\$ 165.00
8/26/2024	Alex Rowan	Meeting with associate R. Bultz to discuss the case timeline and potential exhibits	\$ 395.00	0.30	\$ 118.50
8/26/2024	Alex Rowan	Reviewing State Farm's initial disclosure sheet for potential exhibits	\$ 395.00	0.20	\$ 79.00
8/26/2024	Alex Rowan	Reviewing the docket for State Farm's witness disclosure	\$ 395.00	0.20	\$ 79.00
8/26/2024	Alex Rowan	Analyzing and writing down all witnesses disclosed by Plaintiff to write under which witness an exhibit could be testified to	\$ 395.00	0.20	\$ 79.00
8/26/2024	Alex Rowan	Discussing with R. Bultz witness disclosure deadline	\$ 395.00	0.10	\$ 39.50
8/26/2024	Alex Rowan	Researching local rules and analyzing standing order, as well as order granting continuance, to determine deadline for final witness disclosure.	\$ 395.00	0.10	\$ 39.50
8/26/2024	William Adan	TC with RB. Revised SDT. Emailed OC SDT.	\$ 195.00	0.30	\$ 58.50
8/27/2024	Alex Rowan	Revising the statement of facts for the motion to compel mediation.	\$ 395.00	1.10	\$ 434.50
8/27/2024	Alex Rowan	Corresponding with associate R. Bultz about the motion to compel.	\$ 395.00	0.40	\$ 158.00
8/27/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM DB, CK AND THE CONTINGENCY COMMITTEE RE COSTS AND ATTORNEY HOURS. [N.C.]	\$ 550.00	0.30	\$ 165.00
8/27/2024	Dubs Herschlip	RECEIVE AND REVIEW RB'S EMAIL WITH WESTERN UNION.	\$ 550.00	0.10	\$ 55.00
8/28/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM RB TO WESTERN UNION.	\$ 550.00	0.10	\$ 55.00
8/28/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM DB AND FINANCE REGARDING PAYMENT OF EXPERT WITNESSES' FEE.	\$ 550.00	0.20	\$ 110.00
8/28/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS TRANSITION OF TASKS FROM ASSOCIATES TO PARALEGAL.	\$ 550.00	0.10	\$ 55.00
8/28/2024	Dubs Herschlip	REVIEW AND REVISE MOTION TO COMPEL MEDIATION, DECLARATIONS ISO AND PROPOSED ORDER.	\$ 550.00	0.50	\$ 275.00
8/28/2024	Alex Rowan	Discussing the motion to compel mediation and revisions with associate R. Bultz.	\$ 395.00	0.40	\$ 158.00
8/28/2024	Alex Rowan	Revision of the introduction section	\$ 395.00	0.10	\$ 39.50
8/28/2024	Alex Rowan	Revising citations in accordance with the Bluebook.	\$ 395.00	0.30	\$ 118.50
8/28/2024	Alex Rowan	Revising the factual history section of the motion to compel mediation.	\$ 395.00	0.30	\$ 118.50
8/28/2024	Alex Rowan	Revising and redrafting the argument section of the motion to compel mediation.	\$ 395.00	0.70	\$ 276.50
8/28/2024	Alex Rowan	Revising and redrafting the request for attorney fees in the motion to compel mediation.	\$ 395.00	0.30	\$ 118.50
8/28/2024	Alex Rowan	Revising and redrafting the conclusion to the motion to compel mediation.	\$ 395.00	0.30	\$ 118.50
8/28/2024	Alex Rowan	Final revisions to the second version of the motion to compel before sending to partner D. Herschlip and associate R. Bultz.	\$ 395.00	0.20	\$ 79.00
8/28/2024	Alex Rowan	Corresponding about the motion to compel with partner D. Herschlip and associate R. Bultz.	\$ 395.00	0.10	\$ 39.50
8/28/2024	Alex Rowan	Showing organization of exhibit and witness charts to paralegal W. Adan so that he can continue work on the lists.	\$ 395.00	0.20	\$ 79.00
8/28/2024	Rafael Bultz	Revisions to motion to compel and accompanying documents.	\$ 385.00	1.70	\$ 654.50
8/28/2024	Rafael Bultz	Call with paralegal W. Adan about expert witness Mr. Worth's invoice.	\$ 385.00	0.10	\$ 38.50
8/28/2024	Rafael Bultz	Email to attorney D. Herschlip with updated drafts of the motion to compel mediation and accompanying documents.	\$ 385.00	0.10	\$ 38.50
8/28/2024	Rafael Bultz	Review of motion to compel mediation and accompanying documents with attorney D. Herschlip.	\$ 385.00	0.50	\$ 192.50
8/28/2024	Rafael Bultz	Call with paralegal W. Adan about the filing of a praecipe for the motion to compel mediation that was filed.	\$ 385.00	0.20	\$ 77.00
8/28/2024	Rafael Bultz	Drafting of a praecipe to correct the hearing note date for the motion to compel mediation.	\$ 385.00	0.70	\$ 269.50
8/28/2024	Rafael Bultz	Call attorney A. Rowan regarding revisions of the motion to compel and accompanying documents.	\$ 385.00	0.40	\$ 154.00
8/28/2024	Rafael Bultz	Call with expert witness Robert Worth regarding his invoice.	\$ 385.00	0.10	\$ 38.50
8/28/2024	William Adan	Received and replied to email from DH. TC with Mr. Worth. TC with RB. Emailed DBL controller ACH information.	\$ 195.00	0.10	\$ 19.50
8/28/2024	William Adan	TC with RB. Received and revised Motion, Declarations and proposed order. Filed documents and emailed OC.	\$ 195.00	0.70	\$ 136.50
8/28/2024	William Adan	Emailed the court proposed order.	\$ 195.00	0.10	\$ 19.50

8/28/2024	William Adan	Received email from RB. Revised praecipe to motions and declarations. Filed docs with the court. Emailed OC.	\$ 195.00	0.40	\$ 78.00
8/29/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB, WA AND THE COURT.	\$ 550.00	0.20	\$ 110.00
8/30/2024	Alex Rowan	Reviewing the declaration of Jim Hicks submitted in support of the motion to disqualify	\$ 395.00	0.10	\$ 39.50
8/30/2024	Alex Rowan	Reviewing the proposed order submitted in support of the motion to disqualify	\$ 395.00	0.10	\$ 39.50
8/30/2024	Alex Rowan	Reviewing and analyzing the motion to disqualify	\$ 395.00	0.30	\$ 118.50
8/30/2024	Alex Rowan	Annotating motion to disqualify with notes in opposition.	\$ 395.00	0.20	\$ 79.00
8/30/2024	Alex Rowan	Reviewing exhibit 1 attached to the declaration of Jim Hicks in support of the motion to disqualify	\$ 395.00	0.10	\$ 39.50
8/30/2024	Alex Rowan	Reviewing exhibit 2 attached to the declaration of Jim Hicks in support of the motion to disqualify, and highlighting relevant portions of the declaration in preparation for drafting a reply.	\$ 395.00	0.40	\$ 158.00
8/30/2024	Alex Rowan	Reviewing exhibit 3 attached to the declaration of Jim Hicks in support of the motion to disqualify.	\$ 395.00	0.10	\$ 39.50
8/30/2024	Alex Rowan	Reviewing exhibit 4 attached to the declaration of Jim Hicks in support of the motion to disqualify.	\$ 395.00	0.10	\$ 39.50
8/30/2024	Alex Rowan	Analyzing the report of opposing counsel's expert witness for similarities to be used in the response to the motion to disqualify.	\$ 395.00	0.30	\$ 118.50
8/30/2024	Alex Rowan	Drafting outline of response to opposing party's motion to disqualify expert witness.	\$ 395.00	0.30	\$ 118.50
8/31/2024	Alex Rowan	Revising the motion in accordance with redlines and annotations, as well as confirming accuracy of cites.	\$ 395.00	1.60	\$ 632.00
8/31/2024	Alex Rowan	Researching case law by the Supreme Court on Rule 702.	\$ 395.00	0.50	\$ 197.50
8/31/2024	Alex Rowan	Researching case law on Federal Rule of Evidence 704 in the Supreme Court.	\$ 395.00	0.30	\$ 118.50
8/31/2024	Alex Rowan	Researching case law on Federal Rule of Evidence 702 in the 9th Circuit.	\$ 395.00	1.80	\$ 711.00
8/31/2024	Alex Rowan	Outlining arguments based on case law researched.	\$ 395.00	0.50	\$ 197.50
8/31/2024	Alex Rowan	Researching case law cited by Defendant in support of their motion.	\$ 395.00	0.20	\$ 79.00
8/31/2024	Alex Rowan	Summarizing Defendant's arguments in five points, and writing counter-arguments based on case law research.	\$ 395.00	0.40	\$ 158.00
8/31/2024	Alex Rowan	Revising outline of counter-arguments to Defendant's motion to disqualify	\$ 395.00	0.30	\$ 118.50
8/31/2024	Alex Rowan	Drafting counter arguments to Defendant's motion to exclude based on outlines and case law research.	\$ 395.00	2.40	\$ 948.00
8/31/2024	Alex Rowan	Drafting the opposition to Plaintiff's motion to exclude.	\$ 395.00	3.60	\$ 1,422.00
8/31/2024	Alex Rowan	Printing the motion for hand revisions.	\$ 395.00	0.10	\$ 39.50
8/31/2024	Alex Rowan	Redlining and annotating the motion by hand for revision.	\$ 395.00	1.50	\$ 592.50
9/3/2024	Alex Rowan	Finishing revisions to the opposition to the motion to exclude.	\$ 395.00	1.30	\$ 513.50
9/3/2024	Alex Rowan	Corresponding with partner D. Herschlip and associate R. Bultz about the opposition to opposing counsel's motion to exclude and requesting different revisions from each	\$ 395.00	0.20	\$ 79.00
9/3/2024	Dubs Herschlip	[HOURS RECORDED ON FRIDAY EVENING AFTER HOURS SUBMITTED FOR AUGUST.] RECEIVE AND REVIEW NOTICES FROM COURT OF OC'S MOTION TO EXCLUDE OUR EXPERT. REVIEW. TEXTS WITH AR AND RB. EMAIL TO EXPERT.	\$ 550.00	0.50	\$ 275.00
9/3/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM AR WITH DRAFT RESPONSE TO MOTION TO EXCLUDE OUR EXPERT ATTACHED.	\$ 550.00	0.10	\$ 55.00
9/3/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS HIS CALL WITH OC.	\$ 550.00	0.20	\$ 110.00
9/3/2024	Dubs Herschlip	RECEIVE, REVIEW AND APPROVE DRAFT EMAIL TO MEDIATOR.	\$ 550.00	0.10	\$ 55.00
9/3/2024	Dubs Herschlip	MISSED CALLS FROM EXPERT. X2. DICTATE EMAIL TO EXPERT FOR RB TO SAVE COSTS.	\$ 550.00	0.10	\$ 55.00
9/3/2024	Rafael Bultz	Research into local civil rules for length of opposition brief to motion to exclude expert witness.	\$ 385.00	0.10	\$ 38.50
9/3/2024	Rafael Bultz	Email reply to opposing counsel Hicks	\$ 385.00	0.10	\$ 38.50
9/3/2024	Rafael Bultz	Call with opposing counsel Hicks about motion to compel mediation and potential mediators.	\$ 385.00	0.20	\$ 77.00
9/3/2024	Rafael Bultz	Email to attorneys D. Herschlip and A. Rowan about response deadline for motion to challenge expert testimony.	\$ 385.00	0.10	\$ 38.50
9/3/2024	Rafael Bultz	Review of court-partnered mediators with the Western District of Washington to select one for mediation.	\$ 385.00	0.70	\$ 269.50
9/3/2024	Rafael Bultz	Email to potential mediator Judge Kallas describing case and asking for her to serve as mediator.	\$ 385.00	0.40	\$ 154.00
9/3/2024	William Adan	Meet with RB regarding expert witness	\$ 195.00	0.10	\$ 19.50
9/4/2024	William Adan	Reviewed and revised Request for Mediation document. Emailed RB.	\$ 195.00	0.30	\$ 58.50
9/4/2024	William Adan	Reviewed and replied to RB. Researched local address of CT corp systems to serve SDT	\$ 195.00	0.30	\$ 58.50
9/4/2024	Rafael Bultz	Email to potential mediator Judge Kallas regarding serving as mediator.	\$ 385.00	0.10	\$ 38.50
9/4/2024	Rafael Bultz	Draft of email to opposing counsel Hicks regarding mediator Judge Kallas and whether we would strike our motion to compel mediation.	\$ 385.00	0.60	\$ 231.00

9/4/2024	Rafael Bultz	Drafted request for pro bono mediation to Western District of WA.	\$ 385.00	0.40	\$ 154.00
9/4/2024	Rafael Bultz	Call with opposing counsel Hicks regarding mediation.	\$ 385.00	0.20	\$ 77.00
9/4/2024	Rafael Bultz	Email to opposing counsel Hicks regarding our call and client D. O'Neal's limited budget.	\$ 385.00	0.30	\$ 115.50
9/4/2024	Rafael Bultz	Call with W. Adan regarding filing our request for pro bono mediation.	\$ 385.00	0.10	\$ 38.50
9/4/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS SETTLEMENT NEGOTIATIONS TO STRIKE MOTION TO COMPEL MEDIATION WITH OC. X2	\$ 550.00	0.30	\$ 165.00
9/4/2024	Dubs Herschlip	RECEIVE AND APPROVE DRAFT EMAIL TO OC.	\$ 550.00	0.10	\$ 55.00
9/4/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB AND MEDIATOR'S OFFICE.	\$ 550.00	0.20	\$ 110.00
9/4/2024	Dubs Herschlip	RECEIVE AND APPROVE REQUEST FOR PRO BONO MEDIATION.	\$ 550.00	0.10	\$ 55.00
9/4/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM OC, MEDIATION COORDINATOR, RB AND WA REGARDING MEDIATION, AND PROBONO MEDIATION APPLICATION. [N.C.] X8	\$ 550.00	0.40	\$ 220.00
9/5/2024	Dubs Herschlip	T.C. WITH CLIENT AND RB TO EXPLAIN CASE STATUS, FINANCES, NEXT STEPS AND BOOKING TRAVEL ARRANGMENTS FOR TRIAL, AS WELL AS ADDITIONAL EVIDENCE OF PAYMENTS FROM CLIENT.	\$ 550.00	0.40	\$ 220.00
9/5/2024	Dubs Herschlip	REVIEW AND APPROVE EMAIL TO EXPERT.	\$ 550.00	0.10	\$ 55.00
9/5/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM WA WITH REVISED SDT TO WESTERN UNION ATTACHED.	\$ 550.00	0.10	\$ 55.00
9/5/2024	Alex Rowan	Corresponding with associate R. Bultz and partner D. Herschlip on filing a motion to strike the untimely motion of opposing party.	\$ 395.00	0.10	\$ 39.50
9/5/2024	Rafael Bultz	Draft and review of our response to opposing party's motion to disqualify our expert.	\$ 385.00	1.30	\$ 500.50
9/5/2024	Rafael Bultz	Call with client D. O'Neal and attorney D. Herschlip regarding status of expenses.	\$ 385.00	0.40	\$ 154.00
9/5/2024	Rafael Bultz	Email to expert witness Bob Worth with our draft of our response to opponent's motion to disqualify our expert witness.	\$ 385.00	0.20	\$ 77.00
9/5/2024	Rafael Bultz	Email to paralegal W. Adan about editing the Western Union subpoena ducus tecus.	\$ 385.00	0.10	\$ 38.50
9/5/2024	Rafael Bultz	Review and make edits to our draft of our response to opponent's motion to disqualify our expert witness.	\$ 385.00	0.90	\$ 346.50
9/5/2024	Rafael Bultz	Review of Subpoena Ducus Tecus to Western Union and mailed out to provided address.	\$ 385.00	0.80	\$ 308.00
9/5/2024	Rafael Bultz	Text message to client D. O'Neal with location information for case trial on October 28, 2024.	\$ 385.00	0.10	\$ 38.50
9/5/2024	Rafael Bultz	Email to opposing counsel Hicks with final document drafts.	\$ 385.00	0.10	\$ 38.50
9/5/2024	Rafael Bultz	Call with expert witness Robert Worth regarding the motion to disqualify him.	\$ 385.00	0.30	\$ 115.50
9/5/2024	Rafael Bultz	Email to expert Robert Worth with a draft and guidance on his review of our response to opposing motion to disqualify him.	\$ 385.00	0.20	\$ 77.00
9/5/2024	Rafael Bultz	Email to D. Herschlip, W. Adan, and A. Rowan about deadlines related to the motion to disqualify our witness as well as research into motion to disqualify and response deadlines.	\$ 385.00	0.50	\$ 192.50
9/6/2024	Rafael Bultz	Email to attorney D. Herschlip about response deadline for the motion to exclude our expert.	\$ 385.00	0.30	\$ 115.50
9/6/2024	Rafael Bultz	Email to opposing counsel Hicks letting him know court paused our motion for pro bono mediation until defendant or their attorney signs.	\$ 385.00	0.10	\$ 38.50
9/6/2024	Rafael Bultz	Review of case files to forward to W. Adan to add to our exhibit list.	\$ 385.00	1.60	\$ 616.00
9/6/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB TO EXPERT, AND HIS NOTES ON HIS CALL WITH EXPERT RE DAUBERT.	\$ 550.00	0.20	\$ 110.00
9/6/2024	Dubs Herschlip	RECEIVE EMAIL FROM COURT PROBONO MEDIATION COORDINATOR REJECTING APPLICATION FOR LACKING DEFENDANT'S SIGNATURE.	\$ 550.00	0.10	\$ 55.00
9/6/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM RB CALCULATING FILING DEADLINE ON MOTION TO STRIKE OC'S DAUBERT MOTION. RECEIVE AND REVIEW EMAIL FROM RB TO OC.	\$ 550.00	0.10	\$ 55.00
9/9/2024	Dubs Herschlip	TEAMS CALL WITH TP, AR, RB AND WA TO TASK WA WITH DRAFTING SUBPOENAS FOR TRIAL, AND TASK RB WITH REPLY ISO MOTION TO COMPEL MEDIATION, AND AR WITH RESPONSE TO DAUBERT MOTION.	\$ 550.00	0.30	\$ 165.00
9/9/2024	Dubs Herschlip	TEAMS CALL WITH TP, AR, RB AND WA TO DELEGATE TASK OF REVISING RB'S DRAFT SUMMONS AND PETITION AND OBTAIN STATUS FROM RB.	\$ 550.00	0.20	\$ 110.00
9/9/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM WA WITH DATE OF MAILING OF NOTICE OF DISHONOR AND ACCOUNTING DEMAND.	\$ 550.00	0.10	\$ 55.00
9/9/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM WA RECALENDARING OC'S DEADLINE TO RESPOND TO NOTICE OF DISHONOR.	\$ 550.00	0.10	\$ 55.00
9/9/2024	Alex Rowan	Revising the opposition to the motion to exclude.	\$ 395.00	1.00	\$ 395.00
9/9/2024	Rafael Bultz	Meeting and case status with seattle team.	\$ 385.00	0.20	\$ 77.00
9/10/2024	Rafael Bultz	Call with attorney A. Rowan about draft of opposition to opposing party's motion to disqualify our witness.	\$ 385.00	0.20	\$ 77.00
9/10/2024	Alex Rowan	Calling with associate R. Bultz to discuss expert witness's comments on the opposition.	\$ 395.00	0.20	\$ 79.00
9/10/2024	Alex Rowan	Corresponding with associate R. Bultz to discuss expert witness's comments on the opposition.	\$ 395.00	0.10	\$ 39.50

9/10/2024	William Adan	TC from expert inquiring about wire transfer. Confirmed with finance transfer and emailed and TC with expert with confirmation.	\$ 195.00	0.40	\$ 78.00
9/11/2024	Rafael Bultz	Email to opposing counsel Hicks about our request to sign the pro bono mediation request.	\$ 385.00	0.10	\$ 38.50
9/12/2024	Alex Rowan	Preparing and printing the opposition to redline by hand.	\$ 395.00	0.10	\$ 39.50
9/12/2024	Alex Rowan	Redlining the legal standard section of the opposition to Defendant's motion to exclude the testimony and report of Robert Worth.	\$ 395.00	0.30	\$ 118.50
9/12/2024	Alex Rowan	Redlining the first section of the legal argument in the opposition to Defendant's motion to exclude the testimony and report of Robert Worth, as well as marking points for further research and citation to the record.	\$ 395.00	1.10	\$ 434.50
9/12/2024	Alex Rowan	Redlining the second section of the legal argument in the opposition to Defendant's motion to exclude the testimony and report of Robert Worth, as well as marking points for further research and citation to the record.	\$ 395.00	0.70	\$ 276.50
9/12/2024	Alex Rowan	Redlining the third section of the legal argument in the opposition to Defendant's motion to exclude the testimony and report of Robert Worth.	\$ 395.00	0.20	\$ 79.00
9/12/2024	Alex Rowan	Revising the third section of the legal argument in the opposition to defendant's motion to exclude, to break it into two sections to better complement and argue against Defendant's arguments.	\$ 395.00	2.20	\$ 869.00
9/12/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB TO OC AND TO EMILY NERO COURT CLERK RE MEDIATION.	\$ 550.00	0.10	\$ 55.00
9/12/2024	Dubs Herschlip	RECEIVE AND REVIEW SUBPOENA RESULTS FROM WESTERN UNION.	\$ 550.00	0.10	\$ 55.00
9/12/2024	Dubs Herschlip	ASSET SEARCH ON JOHN MUSE. REAL PROPERTY SEARCH.	\$ 550.00	0.50	\$ 275.00
9/13/2024	Dubs Herschlip	TELECONFERENCE WITH RB AND AR TO DISCUSS DRAFT REPLY ISO TO MOTION TO COMPEL MEDIATION AND RESPONSE TO OC'S DAUBERT MOTION, AND MOTIONS IN LIMINE.	\$ 550.00	0.80	\$ 440.00
9/13/2024	Dubs Herschlip	MEET WITH RB AFTER HIS T.C. WITH OC TO DISCUSS OC'S SANCTIONABLE CONDUCT.	\$ 550.00	0.70	\$ 385.00
9/13/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM OC. RECEIVE EMAIL FROM RB. REVISE EMAIL TO OC.	\$ 550.00	0.20	\$ 110.00
9/13/2024	Dubs Herschlip	RECEIVE AND REPLY TO TEXTS AND EMAILS FROM AR AND RB WITH DRAFT RESPONSES TO OC'S DAUBERT MOTION. REVISE RESPONSE AND PROPOSED ORDER. X3. TEXT WA TO FILE FINALIZED RESPONSE	\$ 550.00	2.20	\$ 1,210.00
9/13/2024	Alex Rowan	Corresponding with associate R. Bultz about opposing party's response to our motion to compel in preparation for drafting a reply.	\$ 395.00	0.30	\$ 118.50
9/13/2024	Alex Rowan	Calling associate R. Bultz to discuss the inventory and possible motion in limine.	\$ 395.00	0.20	\$ 79.00
9/13/2024	Alex Rowan	Calling with associate R. Bultz, with partner D. Herschlip later joining, to discuss the opposition to state farm's motion to exclude, and filing a motion for sanctions.	\$ 395.00	1.50	\$ 592.50
9/13/2024	Alex Rowan	Revising the opposition to state farm's motion to disqualify based on red lines from prior day and review with associate R. Bultz, and adding citations to the record.	\$ 395.00	3.40	\$ 1,343.00
9/13/2024	Alex Rowan	Reviewing the motion to disqualify with associate R. Bultz.	\$ 395.00	1.60	\$ 632.00
9/13/2024	Alex Rowan	Formatting and adding a table of contents to the opposition to the motion to exclude.	\$ 395.00	0.20	\$ 79.00
9/13/2024	Alex Rowan	Researching case law on ultimate issue opinions and legal conclusions.	\$ 395.00	0.40	\$ 158.00
9/13/2024	Alex Rowan	Revising section two of the legal argument in the opposition to defendant's motion to exclude the testimony of plaintiff's expert witness based on case law research.	\$ 395.00	0.40	\$ 158.00
9/13/2024	Alex Rowan	Researching local rules on the deadline, and time and page limit for the response to Defendant's motion to exclude.	\$ 395.00	0.20	\$ 79.00
9/13/2024	Alex Rowan	Revising the introduction to the response to defendant's motion to exclude	\$ 395.00	0.20	\$ 79.00
9/13/2024	Alex Rowan	Revising the statement of facts to the response to defendant's motion to exclude	\$ 395.00	0.10	\$ 39.50
9/13/2024	Alex Rowan	Revising the questions presented and evidence relied on to the response to Defendant's motion to exclude.	\$ 395.00	0.10	\$ 39.50
9/13/2024	Rafael Bultz	Meeting with attorney D. Herschlip do discuss call with opposing attorney and take down notes.	\$ 385.00	0.50	\$ 192.50
9/13/2024	Rafael Bultz	Draft of email to opposing counsel Hicks about our call.	\$ 385.00	0.50	\$ 192.50
9/13/2024	Rafael Bultz	Draft of declaration for myself for our response.	\$ 385.00	0.40	\$ 154.00
9/13/2024	Rafael Bultz	Communication with attorney A. Rowan about reply to opposing party's response to our motion to compel mediation.	\$ 385.00	0.30	\$ 115.50
9/13/2024	Rafael Bultz	Call with attorney A. Rowan to discuss litigation strategy for trial.	\$ 385.00	0.20	\$ 77.00
9/13/2024	Rafael Bultz	Draft of Reply to opposing party's opposition to our motion to compel mediation.	\$ 385.00	1.10	\$ 423.50
9/13/2024	Rafael Bultz	Draft of Reply to opposing party's opposition to our motion to compel mediation.	\$ 385.00	1.80	\$ 693.00
9/13/2024	Rafael Bultz	Call with opposing counsel Hicks about sanctions and misrepresentations on their motion to exclude our expert witness.	\$ 385.00	0.50	\$ 192.50
9/14/2024	Rafael Bultz	Call with attorney A. Rowan to finalize opposition to comply with the western district rules.	\$ 385.00	0.40	\$ 154.00
9/14/2024	Rafael Bultz	Revision of opposition to motion to disqualify our expert witness.	\$ 385.00	2.10	\$ 808.50
9/14/2024	Alex Rowan	Redlining the response to defendant's motion to exclude to remove portions to get within the word count required by the local rules.	\$ 385.00	1.40	\$ 539.00

9/14/2024	Alex Rowan	Editing the response to defendant's motion to exclude to remove parts to fit within word limits set by the local rules and judge's accelerated briefing schedule.	\$ 395.00	1.60	\$ 632.00
9/14/2024	Alex Rowan	Reviewing and revising the proposed order denying the defendant's motion.	\$ 395.00	0.20	\$ 79.00
9/14/2024	Alex Rowan	Making final revisions to the opposition to defendant's motion to exclude.	\$ 395.00	0.90	\$ 355.50
9/14/2024	Alex Rowan	Corresponding with partner D. Herschlip about the opposition to defendant's motion to exclude and requesting reviewal.	\$ 395.00	0.10	\$ 39.50
9/14/2024	Alex Rowan	Calling with R. Bultz to finalize the opposition to comply with the local rules for the Western District of Washington.	\$ 395.00	0.40	\$ 158.00
9/14/2024	Alex Rowan	Corresponding with paralegal W. Adan about filing the motion.	\$ 395.00	0.10	\$ 39.50
9/14/2024	William Adan	Text with DH. RB and AR. Emailed PO to court and OC.	\$ 195.00	0.30	\$ 58.50
9/14/2024	William Adan	Revised document and Filed response	\$ 195.00	0.40	\$ 78.00
9/16/2024	Alex Rowan	Discussing case status and next steps forward with Partner D. Herschlip and associates R. Bultz and T. Pearson	\$ 395.00	0.10	\$ 39.50
9/16/2024	Alex Rowan	Discussing collections possibilities against John Muse	\$ 395.00	0.10	\$ 39.50
9/16/2024	Dubs Herschlip	TEAMS CALL WITH AR, TP, RB AND WA TO DELEGATE REQUEST TO FIRM FOR RATES ON JUDGMENT COLLECTIONS AGAINST MUSE, AS WELL AS DRAFTING MOTIONS IN LIMINE, EXHIBIT LIST AND REPLY ISO MOTION TO COMPEL MEDIATION.	\$ 550.00	0.30	\$ 165.00
9/16/2024	Dubs Herschlip	RECEIVE AND REVIEW EVIDENCE SUBPOENAED BY OC FROM ALL MY FRIENDS. RECEIVE AND REPLY TO EMAIL FROM WA REGARDING POSITIONING ON TRIAL EXHIBIT LIST.	\$ 550.00	0.40	\$ 220.00
9/16/2024	Rafael Bultz	Drafting of our reply to opposition to our motion to compel.	\$ 385.00	1.80	\$ 693.00
9/16/2024	Rafael Bultz	Meeting and case status with seattle team.	\$ 385.00	0.30	\$ 115.50
9/16/2024	Rafael Bultz	Meeting and case status with seattle team.	\$ 385.00	0.10	\$ 38.50
9/16/2024	Rafael Bultz	Meeting and case status with seattle team.	\$ 385.00	0.10	\$ 38.50
9/16/2024	Rafael Bultz	Draft of our reply to opposition to our motion to disqualify expert.	\$ 385.00	2.20	\$ 847.00
9/17/2024	Rafael Bultz	Review of email from opposing counsel Hicks.	\$ 385.00	0.10	\$ 38.50
9/17/2024	Rafael Bultz	Draft of email to opposing counsel Hicks regarding Rule 11 violations.	\$ 385.00	0.30	\$ 115.50
9/17/2024	Rafael Bultz	Drafting of our reply to opposition to our motion to compel mediation.	\$ 385.00	5.10	\$ 1,963.50
9/17/2024	Rafael Bultz	Drafting of declaration to go along with reply.	\$ 385.00	2.20	\$ 847.00
9/17/2024	Rafael Bultz	Legal research into ADR rules for the western district of washington.	\$ 385.00	0.70	\$ 269.50
9/17/2024	Rafael Bultz	Email to W. Adan with documents to file for our reply.	\$ 385.00	0.10	\$ 38.50
9/17/2024	Rafael Bultz	Final revisions to our reply and my declaration.	\$ 385.00	1.30	\$ 500.50
9/17/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM OC WITH NOTICE OF MOTION FOR SANCTIONS.	\$ 550.00	0.10	\$ 55.00
9/17/2024	Dubs Herschlip	RECEIVE AND REVIEW ANOTHER EMAIL FROM OC. REVIEW AND DICTATE REVISIONS TO RB'S EMAIL IN RESPONSE.	\$ 550.00	0.20	\$ 110.00
9/17/2024	Dubs Herschlip	REVIEW AND REVISE DRAFT REPLY ISO MOTION TO COMPEL MEDIATION.	\$ 550.00	0.60	\$ 330.00
9/17/2024	Alex Rowan	Corresponding with associate R. Bultz about the reply and scope of revisions requested	\$ 395.00	0.10	\$ 39.50
9/17/2024	Alex Rowan	Revising citations to the reply in support of our motion to compel mediation.	\$ 385.00	0.40	\$ 154.00
9/17/2024	Alex Rowan	Revising the arguments in the reply in support of our motion to compel mediation.	\$ 385.00	0.60	\$ 231.00
9/17/2024	Alex Rowan	Revising the declaration in support of the reply.	\$ 385.00	0.20	\$ 77.00
9/17/2024	Alex Rowan	Corresponding about revisions with associate R. Bultz.	\$ 385.00	0.20	\$ 77.00
9/17/2024	William Adan	Met with RB. Revised Reply and declaration and filed both. Emailed OC.	\$ 195.00	0.70	\$ 136.50
9/18/2024	Dubs Herschlip	BEGIN DRAFTING PLAINTIFF'S PRETRIAL STATEMENT.	\$ 550.00	0.20	\$ 110.00
9/18/2024	Dubs Herschlip	RECEIVE AND REVIEW LATE FILED RESPONSE FROM OC.	\$ 550.00	0.20	\$ 110.00
9/18/2024	Rafael Bultz	Draft of our pretrial statement.	\$ 385.00	2.10	\$ 808.50
9/18/2024	Rafael Bultz	Review of the second declaration filed by opposing counsel regarding our motion to mediate.	\$ 385.00	0.30	\$ 115.50
9/19/2024	Rafael Bultz	Research into whether we can strike opposing counsel's second declaration that was filed after our reply.	\$ 385.00	0.50	\$ 192.50
9/19/2024	Rafael Bultz	Draft of pretrial statement.	\$ 385.00	2.30	\$ 885.50
9/19/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS OC'S LATE FILED DECLARATION, AND OC'S HEARING.	\$ 550.00	0.20	\$ 110.00
9/20/2024	Alex Rowan	Analyzing case evidence and positions adopted by opposing counsel to look for weaknesses and strengths of case in preparation for drafting motions in limine.	\$ 395.00	1.00	\$ 395.00
9/20/2024	Alex Rowan	Corresponding with partner D. Herschlip about subjects for motions in limine to be drafted.	\$ 395.00	0.20	\$ 79.00
9/20/2024	Rafael Bultz	Drafting of motions in limine.	\$ 385.00	2.10	\$ 808.50
9/20/2024	Rafael Bultz	Drafting of plaintiff's pretrial statement.	\$ 385.00	2.00	\$ 770.00
9/21/2024	Rafael Bultz	Call with A. Rowan and D. Herschlip to discuss motions in limine.	\$ 385.00	2.20	\$ 847.00
9/21/2024	Alex Rowan	Discussing with partner D. Herschlip and associate R. Bultz case strengths and weaknesses in order to brainstorm motions in limine	\$ 395.00	0.90	\$ 355.50
9/21/2024	Alex Rowan	Analyzing the Chambers Trial Quick Citations to brainstorm further motions in limine.	\$ 395.00	0.20	\$ 79.00
9/21/2024	Alex Rowan	Analyzing the motion in limine files to brainstorm motions in limine we want filed.	\$ 395.00	1.10	\$ 434.50

9/21/2024	Alex Rowan	Assembling a list of possible motions in limine for review, approval, and denial, with partner D. Herschlip and associate R. Bultz.	\$ 395.00	0.60	\$ 237.00
9/21/2024	Alex Rowan	Researching case law on motions in limine brought by plaintiffs against insurance companies under bad faith denial claims.	\$ 395.00	0.80	\$ 316.00
9/21/2024	Alex Rowan	Going through the list of motions in limine with partner D. Herschlip and R. Bultz for their thoughts on whether we should bring a motion for them, and striking ideas or topics that we decide not to bring one on.	\$ 395.00	1.30	\$ 513.50
9/21/2024	Alex Rowan	Researching the local rules of the western district of washington on motions in limine.	\$ 395.00	0.20	\$ 79.00
9/21/2024	Alex Rowan	Corresponding with partner D. Herschlip about a local rule requirement	\$ 395.00	0.10	\$ 39.50
9/21/2024	Dubs Herschlip	RESEARCH AND DRAFT MOTIONS IN LIMINE.	\$ 550.00	0.30	\$ 165.00
9/21/2024	Dubs Herschlip	T.C. WITH AR AND RB TO DISCUSS NECESSARY EVIDENCE AND WITNESSES, AND EVALUATE APPROPRIATE MOTIONS IN LIMINE.	\$ 550.00	0.90	\$ 495.00
9/21/2024	Dubs Herschlip	T.C. WITH AR AND RB TO FURTHER DISCUSS MOTIONS IN LIMINE. REVIEW PRIOR COURT ORDERS. REVIEW CASE EVIDENCE.	\$ 550.00	1.30	\$ 715.00
9/22/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS AND TEXTS FROM AR WITH BRIEFING ATTACHED. EMAIL OC.	\$ 550.00	0.40	\$ 220.00
9/22/2024	Dubs Herschlip	RECEIVE AND REVIEW OUTLINE OF MOTIONS IN LIMINE. EMAIL OC.	\$ 550.00	0.50	\$ 275.00
9/22/2024	Alex Rowan	Researching the judge's chambers procedures for any requirements on the form of the motions in limine	\$ 395.00	0.20	\$ 79.00
9/22/2024	Alex Rowan	Researching requirements in the local rules for the western district of Washington to see if there are any requirements about the form of a motion in limine.	\$ 395.00	0.20	\$ 79.00
9/22/2024	Alex Rowan	Researching case law on the meet and confer requirement for motions in limine	\$ 395.00	0.50	\$ 197.50
9/22/2024	Alex Rowan	Researching case law on motions in limine and analyzing similar motions filed in the western district of washington in preparation for drafting motions in limine	\$ 395.00	0.70	\$ 276.50
9/22/2024	Alex Rowan	Drafting the motions in limine.	\$ 395.00	0.10	\$ 39.50
9/22/2024	Alex Rowan	Organizing the motions in limine by topic	\$ 395.00	0.30	\$ 118.50
9/22/2024	Alex Rowan	Drafting an outline of the motions in limine and formatting the motion.	\$ 395.00	1.30	\$ 513.50
9/23/2024	Alex Rowan	Drafting the motions in limine	\$ 395.00	3.40	\$ 1,343.00
9/23/2024	Alex Rowan	corresponding with R. Bultz about the motions in limine	\$ 395.00	0.20	\$ 79.00
9/23/2024	Alex Rowan	Discussing opposing party's proposed motions in limine with partner D. Herschlip and associate R. Bultz	\$ 395.00	1.20	\$ 474.00
9/23/2024	Alex Rowan	Meeting and conferring with opposing counsel about motions in limine and establishing a time later for further discussion after review	\$ 395.00	0.20	\$ 79.00
9/23/2024	Alex Rowan	Reviewing opposing party's motions in limine.	\$ 395.00	0.50	\$ 197.50
9/23/2024	Alex Rowan	Review of the proposed motions in limine with partner D. Herschlip.	\$ 395.00	0.60	\$ 237.00
9/23/2024	Alex Rowan	Corresponding with opposing counsel on our proposed motions in limine.	\$ 395.00	0.20	\$ 79.00
9/23/2024	Alex Rowan	Meet and confer with opposing party on the motions in limine.	\$ 395.00	1.50	\$ 592.50
9/23/2024	Alex Rowan	Researching support for motions in limine	\$ 395.00	2.10	\$ 829.50
9/23/2024	Alex Rowan	Meeting with D. Herschlip and R. Bultz to confirm stipulations to the motions in limine.	\$ 395.00	0.30	\$ 118.50
9/23/2024	Alex Rowan	Conferring with partner D. Herschlip on striking certain motions in limine.	\$ 395.00	0.20	\$ 79.00
9/23/2024	Alex Rowan	Conferring with associate R. Bultz on motions in limine	\$ 395.00	0.70	\$ 276.50
9/23/2024	Alex Rowan	Revising motions in limine.	\$ 395.00	0.90	\$ 355.50
9/23/2024	Dubs Herschlip	TEAMS CALL WITH AR, WA AND RB TO DISCUSS MOTIONS IN LIMINE DUE TO BE FILED TODAY AND PRE-TRIAL STATEMENT TO OC, AS WELL AS TELECONFERENCE WITH OC.	\$ 550.00	0.30	\$ 165.00
9/23/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS SPECIFIC COVERAGE AMOUNTS IN EXCESS OF \$100,000 DESCRIBED IN INSURANCE FILE. REVIEW FILE.	\$ 550.00	0.20	\$ 110.00
9/23/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM AR AND OC IN PREPARATION FOR TELECONFERENCE ON MOTIONS IN LIMINE.	\$ 550.00	0.20	\$ 110.00
9/23/2024	Dubs Herschlip	TELECONFERENCE WITH OC JIM HICKS, AR AND RB RE MOTIONS IN LIMINE.	\$ 550.00	0.20	\$ 110.00
9/23/2024	Dubs Herschlip	TEAMS CONFERENCE WITH AR AND RB TO REVIEW OC'S PROPOSED MOTIONS IN LIMINE.	\$ 550.00	1.40	\$ 770.00
9/23/2024	Dubs Herschlip	T.C. WITH AR TO DICTATE REVISIONS TO MOTIONS IN LIMINE.	\$ 550.00	0.70	\$ 385.00
9/23/2024	Dubs Herschlip	MEET WITH CONFER WITH OC JIM HICKS, RB AND AR.	\$ 550.00	1.00	\$ 550.00
9/23/2024	Dubs Herschlip	REVIEW EMAIL FROM OC WITH HIS DRAFT MIL. T.C. WITH AR AND RB	\$ 550.00	0.40	\$ 220.00
9/23/2024	Dubs Herschlip	T.C. WITH AR AND RB TO DISCUSS REMOVING MIL'S OBJECTED TO BY OC AS SUBSTANTIVE/MSJ MOTIONS.	\$ 550.00	0.20	\$ 110.00
9/23/2024	Rafael Bultz	Meeting and case status with seattle team.	\$ 385.00	0.30	\$ 115.50
9/23/2024	Rafael Bultz	Meeting and case status with seattle team.	\$ 385.00	0.10	\$ 38.50
9/23/2024	Rafael Bultz	Email to litigation team with plaintiff's pretrial statement.	\$ 385.00	0.10	\$ 38.50
9/23/2024	Rafael Bultz	Call with opposing counsel Hicks and our team to discuss motions in limine.	\$ 385.00	1.50	\$ 577.50
9/23/2024	Rafael Bultz	Email to opposing counsel Hicks with my understanding of our call and agreement regarding motions in limine.	\$ 385.00	1.10	\$ 423.50

9/23/2024	Rafael Bultz	Drafting of motions in limine.	\$ 385.00	4.10	\$ 1,578.50
9/23/2024	Rafael Bultz	Revisions of pretrial statement.	\$ 385.00	2.20	\$ 847.00
9/23/2024	Rafael Bultz	Call with opposing counsel Hicks.	\$ 385.00	0.20	\$ 77.00
9/23/2024	Rafael Bultz	Call with A. Rowan and D. Herschlip to go over our motions in limine.	\$ 385.00	1.50	\$ 577.50
9/23/2024	Rafael Bultz	Editing of pretrial statement.	\$ 385.00	1.10	\$ 423.50
9/23/2024	Tracy Pearson	Discussed case status and strategy at team meeting.	\$ 595.00	0.20	\$ 119.00
9/24/2024	Rafael Bultz	Email to opposing counsel Hicks regarding service of document.	\$ 385.00	0.10	\$ 38.50
9/24/2024	Rafael Bultz	Email to Seattle team with an update of the draft.	\$ 385.00	0.10	\$ 38.50
9/24/2024	Rafael Bultz	Drafting of plaintiff's pretrial statement.	\$ 385.00	3.20	\$ 1,232.00
9/24/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM AR, RB AND OC. REVIEW THE MOTIONS IN LIMINE FILED WITH THE COURT. X14	\$ 550.00	0.30	\$ 165.00
9/25/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM OC'S ASSISTANT REQUESTING DISCOVERY.	\$ 550.00	0.10	\$ 55.00
9/25/2024	Dubs Herschlip	MEET WITH WA TO DRAFT OPENING, AND REVIEW EVIDENCE LIST FOR PRE-TRIAL STATEMENT.	\$ 550.00	0.50	\$ 275.00
9/25/2024	William Adan	TC from expert witness. Emailed RB and DH my call notes.	\$ 195.00	0.40	\$ 78.00
9/26/2024	William Adan	Received and replied to OC's office about WU SDT. Met with DH to retrieve correspondence about SDT and emailed OC's office with results.	\$ 195.00	0.30	\$ 58.50
9/26/2024	Dubs Herschlip	DOWNLOAD OF WESTERN UNION'S RESPONSE FOR OC.	\$ 550.00	0.20	\$ 110.00
9/26/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM WA AND OC'S ASSISTANT. [N.C.]	\$ 550.00	0.10	\$ 55.00
9/26/2024	Dubs Herschlip	EMAIL AR ASSIGNING DRAFT PROPOSED ORDER ON MIL. RECEIVE ORDER FROM COURT RENOTING MIL FOR 10/18.	\$ 550.00	0.10	\$ 55.00
9/26/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM RB RE OC'S T.C.	\$ 550.00	0.10	\$ 55.00
9/26/2024	Alex Rowan	Corresponding with partner D. Herschlip about drafting a proposed order for the motions in limine	\$ 395.00	0.20	\$ 79.00
9/26/2024	Alex Rowan	Researching orders granting and denying in part motions in limine in the Western District of Washington	\$ 395.00	0.50	\$ 197.50
9/26/2024	Alex Rowan	Drafting the order granting uncontested motions in limine	\$ 395.00	0.90	\$ 355.50
9/26/2024	Alex Rowan	Drafting the introduction and background section of the order	\$ 395.00	0.30	\$ 118.50
9/26/2024	Alex Rowan	Drafting the proposed order granting contested motions in limine on Plaintiff's motions.	\$ 395.00	1.90	\$ 750.50
9/26/2024	Alex Rowan	Discussing proposed order with associate R. Bultz, as well as coordinating drafting	\$ 395.00	0.50	\$ 197.50
9/26/2024	Rafael Bultz	Call with opposing counsel about remote and settlement offer.	\$ 385.00	0.20	\$ 77.00
9/26/2024	Rafael Bultz	Email to opposing counsel about call and settlement offer.	\$ 385.00	0.20	\$ 77.00
9/26/2024	Rafael Bultz	Call with attorney A. Rowan about proposed order for motions in limine.	\$ 385.00	1.00	\$ 385.00
9/26/2024	Rafael Bultz	Edits to proposed order for motions in limine.	\$ 385.00	0.80	\$ 308.00
9/27/2024	Rafael Bultz	Drafting of pretrial statement.	\$ 385.00	2.90	\$ 1,116.50
9/27/2024	Rafael Bultz	Call with expert witness Robert Worth about motion to exclude him from opposing party.	\$ 385.00	0.10	\$ 38.50
9/27/2024	Alex Rowan	Receiving and reading settlement offer by opposing counsel.	\$ 395.00	0.10	\$ 39.50
9/27/2024	Alex Rowan	Researching RCW 48.30.015 to confirm damages award under the Washington IFCA.	\$ 395.00	0.10	\$ 39.50
9/27/2024	Alex Rowan	Drafting response to opposing counsel's settlement offer.	\$ 395.00	0.10	\$ 39.50
9/27/2024	Alex Rowan	Corresponding with partner D. Herschlip and associate R. Bultz about the settlement offer.	\$ 395.00	0.10	\$ 39.50
9/27/2024	Alex Rowan	Finishing drafting the proposed order on Plaintiffs' motions in limine.	\$ 395.00	1.60	\$ 632.00
9/27/2024	Alex Rowan	Researching case law in support of the proposed order on motions in limine and verifying accuracy of citations.	\$ 395.00	0.70	\$ 276.50
9/27/2024	Alex Rowan	Starting drafting response to defendant's motions in limine.	\$ 395.00	0.40	\$ 158.00
9/27/2024	Alex Rowan	Corresponding about the motions in limine with partner D. Herschlip and associate R. Bultz and requesting revision.	\$ 395.00	0.10	\$ 39.50
9/27/2024	Alex Rowan	Revising the proposed order on the motions in limine.	\$ 395.00	0.60	\$ 237.00
9/27/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS REMOTE OF MIL AND STATUS OF PROPOSED ORDER.	\$ 550.00	0.10	\$ 55.00
9/27/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS EXPERT FEEDBACK ON TRIAL COSTS AND AVAILABILITY.	\$ 550.00	0.10	\$ 55.00
9/29/2024	Dubs Herschlip	REVIEW AND REVISE PROPOSED ORDER ON MOTIONS IN LIMINE. LEGAL RESEARCH. EMAIL AR.	\$ 550.00	3.20	\$ 1,760.00
9/29/2024	Dubs Herschlip	RECEIVE AND REVISE PRE-TRIAL STATEMENT. EMAIL RB.	\$ 550.00	3.40	\$ 1,870.00
9/30/2024	Dubs Herschlip	TEXTS AND EMAILS WITH WA RE COURT'S TRIAL PROCEEDING TODAY.	\$ 550.00	0.20	\$ 110.00
9/30/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM AR RE REVISED MOTIONS IN LIMINE.	\$ 550.00	0.10	\$ 55.00
9/30/2024	Dubs Herschlip	T.C. WITH TP, RB AND WA TO DISCUSS CASE STATUS AND ASSIGNMENTS IN TRIALPREP AND SUBPOENAS TO WITNESSES.	\$ 550.00	0.30	\$ 165.00
9/30/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS RESPONSE TO OC'S SETTLEMENT OFFER.	\$ 550.00	0.10	\$ 55.00
9/30/2024	Dubs Herschlip	TEXT AR AND RB TO FILE RE-NOTE OF MIL AND PROPOSED ORDER. RECEIVE AND REPLY TO TEXTS.	\$ 550.00	0.20	\$ 110.00

9/30/2024	Dubs Herschlip	RECEIVE AND REVIEW REVISED PRETRIAL STATEMENT. EMAIL WA RE EXHIBIT LIST.	\$ 550.00	0.20	\$ 110.00
9/30/2024	Alex Rowan	Finishing the proposed order on the motions in limine	\$ 395.00	0.30	\$ 118.50
9/30/2024	Alex Rowan	Sending the finished proposed order on the motions in limine to R. Bultz	\$ 395.00	0.10	\$ 39.50
9/30/2024	Rafael Bultz	Response to opposing counsel's settlement offer.	\$ 385.00	0.10	\$ 38.50
9/30/2024	Rafael Bultz	Drafting of pretrial statement.	\$ 385.00	2.80	\$ 1,078.00
9/30/2024	William Adan	Revised motion in limine and filed it. Emailed OC and the court proposed order.	\$ 195.00	0.40	\$ 78.00
10/1/2024	William Adan	Worked on collecting and organizing exhibits trial list	\$ 195.00	1.90	\$ 370.50
10/1/2024	Tracy Pearson	Draft Subpoenas for Trial.	\$ 595.00	2.20	\$ 1,309.00
10/1/2024	Rafael Bultz	Review of Plaintiff's Pretrial Statement.	\$ 385.00	1.90	\$ 731.50
10/1/2024	Rafael Bultz	Email to opposing counsel Hicks with motions in limine that were filed with the court.	\$ 385.00	0.10	\$ 38.50
10/1/2024	Rafael Bultz	Email to opposing counsel Hicks with Plaintiff's pretrial statement.	\$ 385.00	0.10	\$ 38.50
10/1/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM COURT BAILIFF.	\$ 550.00	0.10	\$ 55.00
10/1/2024	Dubs Herschlip	RECEIVE AND REPLY TO ANOTHER EMAIL FROM COURT BAILIFF.	\$ 550.00	0.10	\$ 55.00
10/1/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM TP RE TRIAL SUBPOENAS.	\$ 550.00	0.10	\$ 55.00
10/1/2024	Dubs Herschlip	PREPARE FOR TRIAL INCLUDING ORDER OF WITNESSES, REVISIONS TO SUBPOENA. RECEIVE AND REVIEW NOTICE OF REMOVAL OF DUPLICATIVE MOTIONS IN LIMINE FROM COURT DOCKET.	\$ 550.00	0.50	\$ 275.00
10/1/2024	Dubs Herschlip	REVISE PRETRIAL STATEMENT. EMAIL RB.	\$ 550.00	1.00	\$ 550.00
10/1/2024	Dubs Herschlip	REVIEW AND EXECUTE PRE-TRIAL STATEMENT.	\$ 550.00	0.40	\$ 220.00
10/2/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM TP WITH SUBPOENAS ATTACHED. EMAIL TO RB AND WA.	\$ 550.00	0.10	\$ 55.00
10/2/2024	Dubs Herschlip	MEET WITH RB. REHEARSE TRIAL AND WITNESS ORDER. DICTATE REVISIONS TO SUBPOENAS, 30(B)(6) SUBPOENA, AND DIRECTIONS ON SERVICE. DICTATE JURY INSTRUCTIONS, PRETRIAL ORDER, EXHIBITS LIST WITH OBJECTIONS AND BASES. EMAIL FORMS TO RB.	\$ 550.00	1.50	\$ 825.00
10/2/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM TP AND RB RE SUBPOENAS.X3	\$ 550.00	0.10	\$ 55.00
10/2/2024	Rafael Bultz	Review and respond to email about the subpoena drafts.	\$ 385.00	0.10	\$ 38.50
10/2/2024	Rafael Bultz	Meeting with attorney D. Herschlip to determine witness testifying strategy.	\$ 385.00	0.80	\$ 308.00
10/2/2024	Rafael Bultz	Drafted and reviewed subpoenas and letters for witnesses appearing at trial.	\$ 385.00	3.10	\$ 1,193.50
10/3/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM COURT CLERK RE TRAINING.	\$ 550.00	0.10	\$ 55.00
10/3/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM RB RE TRIAL SUBPOENAS.	\$ 550.00	0.10	\$ 55.00
10/3/2024	Tracy Pearson	Reviewed subpoena letters and follow up status with team.	\$ 595.00	0.30	\$ 178.50
10/3/2024	William Adan	Received and reviewed. correspondence the court about training.	\$ 195.00	0.10	\$ 19.50
10/3/2024	William Adan	Emailed RB and TP requesting instruction on Subpoenas	\$ 195.00	0.10	\$ 19.50
10/3/2024	William Adan	Received and reviewed sms from RB with instructions on subpoenas. Replied with email.	\$ 195.00	0.20	\$ 39.00
10/3/2024	William Adan	Emailed OC James Hicks to inquire if he would accept service on behalf of SFFCC employees.	\$ 195.00	0.10	\$ 19.50
10/3/2024	William Adan	Received and reviewed OC Hicks' email response.	\$ 195.00	0.10	\$ 19.50
10/3/2024	William Adan	Prepared 15 subpoenas for 1st class and certified mailing.	\$ 195.00	0.80	\$ 156.00
10/3/2024	William Adan	Traveled to and from US post office in Everett, WA. to collect receipts of certified mailing of subpoenas from mail clerk.	\$ 195.00	1.10	\$ 214.50
10/4/2024	William Adan	TC call with RB.	\$ 195.00	0.10	\$ 19.50
10/4/2024	Rafael Bultz	Email to counsel Hicks with individuals State Farm employees we are looking to subpoena for trial.	\$ 385.00	0.20	\$ 77.00
10/4/2024	Alex Rowan	Reading and reviewing the order denying defendant's motion to exclude the testimony of Robert Worth and correspondence with Mr. Worth about the same.	\$ 395.00	0.20	\$ 79.00
10/7/2024	William Adan	SMS from DH. Emailed billing requesting client information.	\$ 195.00	0.10	\$ 19.50
10/8/2024	Dubs Herschlip	DRAFT JURY INSTRUCTIONS.	\$ 550.00	1.30	\$ 715.00
10/8/2024	Dubs Herschlip	T.C. WITH TP, AR, RB AND WA TO DISCUSS CASE STATUS AND ASSIGNMENTS.	\$ 550.00	0.10	\$ 55.00
10/8/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB, CLIENT, ROBERT WORTH AND OC. [N.C.] X10	\$ 550.00	0.10	\$ 55.00
10/9/2024	Dubs Herschlip	RECEIVE AND REVIEW OC'S PROPOSED JURY INSTRUCTIONS AND PRE-TRIAL STATEMENT.	\$ 550.00	1.20	\$ 660.00
10/9/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS OC'S PROPOSED ORDER, VOIRE DIRE AND OPENING.	\$ 550.00	0.40	\$ 220.00
10/9/2024	Dubs Herschlip	FORMAT DISPUTED PRE-TRIAL ORDER. EMAIL OC. REQUEST TELECONFERENCE TO RESOLVE DISPUTED ISSUES. RECEIVE AND REPLY TO EMAIL FROM COURT CLERK RESCHEDULING PRETRIAL CONFERENCE.	\$ 550.00	1.10	\$ 605.00
10/9/2024	Dubs Herschlip	DRAFT DISPUTED PROPOSED JURY INSTRUCTIONS.	\$ 550.00	6.00	\$ 3,300.00
10/9/2024	Dubs Herschlip	TEAMS CONFERENCE TO DISCUSS PRE-TRIAL ORDER, WITNESS AVAILABILITY, EVIDENTIARY OBJECTIONS, AND JURY INSTRUCTIONS WITH RB AND ATTORNEYS FOR SF-JIM HICKS, SHAWN MARRIN.	\$ 550.00	1.00	\$ 550.00

10/9/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM OC AND RB. X6 REVIEW ATTACHMENTS AND REVISIONS TO PRETRIAL ORDER. RECEIVE AND REPLY TO TEXTS FROM RB. REVIEW EMAIL WITH OBJECTIONS TO SUBPOENAS TO STATE FARM EMPLOYEES.	\$ 550.00	0.60	\$ 330.00
10/9/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM CLIENT AND WA WITH LOGISTICS FOR TRIAL. X4	\$ 550.00	0.10	\$ 55.00
10/9/2024	Dubs Herschlip	CONTINUE TO REVISE JURY INSTRUCTIONS. RECEIVE AND REPLY TO EMAILS FROM OC. EMAIL WA WITH FINAL TO BE FILED.	\$ 550.00	1.00	\$ 550.00
10/9/2024	Rafael Bultz	Email to opposing counsel Hicks with pretrial order draft.	\$ 385.00	0.20	\$ 77.00
10/9/2024	Rafael Bultz	Email to expert witness Robert Worth about logistics of him testifying at trial.	\$ 385.00	0.20	\$ 77.00
10/9/2024	Rafael Bultz	Call with opposing counsel Hicks and attorney D. Herschlip about the Pretrial Statement to file with the court.	\$ 385.00	1.00	\$ 385.00
10/9/2024	Rafael Bultz	Revisions to pretrial order based on call with opposing counsel.	\$ 385.00	0.90	\$ 346.50
10/9/2024	Rafael Bultz	Further revisions to Pretrial Order based on feedback from opposing counsel.	\$ 385.00	0.70	\$ 269.50
10/9/2024	Rafael Bultz	Final edits to Pretrial Order before filing with the court.	\$ 385.00	0.60	\$ 231.00
10/9/2024	Rafael Bultz	Drafting of Pretrial Order.	\$ 385.00	8.40	\$ 3,234.00
10/9/2024	William Adan	Met with DH. Researched Trial lodging accommodations for attorneys.	\$ 195.00	0.10	\$ 19.50
10/9/2024	William Adan	Received and archived notice from the court regarding rescheduled court hearing.	\$ 195.00	0.10	\$ 19.50
10/9/2024	William Adan	Meet with RB. Researched archives for plaintiff's initial disclosure statement. Emailed RB.	\$ 195.00	0.10	\$ 19.50
10/9/2024	William Adan	Met with RB. Scheduled TC with OC Hicks, DH and RB. Emailed OC.	\$ 195.00	0.20	\$ 39.00
10/10/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM POLICE OFFICER RE SUBPOENA.	\$ 550.00	0.10	\$ 55.00
10/10/2024	Dubs Herschlip	MEET WITH WA TO DISCUSS POLICE OFFICER'S AVAILABILITY AFFECT ON WITNESS ORDER.	\$ 550.00	0.10	\$ 55.00
10/11/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS JUDGE'S PREFERENCES AND FEEDBACK, AS WELL AS TRIAL PREP.	\$ 550.00	0.20	\$ 110.00
10/11/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS CASE LOGISTICS VIS-A-VIS CLIENT AND OUR EXPERT.	\$ 550.00	0.40	\$ 220.00
10/11/2024	Dubs Herschlip	RECEIVE AND REVIEW OC'S OFFER OF JUDGMENT. MEET WITH RB TO DISCUSS.	\$ 550.00	0.20	\$ 110.00
10/11/2024	William Adan	Met with DH. RB. Communicated with client.	\$ 195.00	0.20	\$ 39.00
10/11/2024	William Adan	Emailed OC Craft.	\$ 195.00	0.10	\$ 19.50
10/11/2024	Rafael Bultz	Email to opposing counsel about parties attending pretrial conference.	\$ 385.00	0.10	\$ 38.50
10/11/2024	Rafael Bultz	Email to expert witness about travel, meeting, and logistics.	\$ 385.00	0.50	\$ 192.50
10/11/2024	Rafael Bultz	Review of offer of judgment from opposing party. Research into relevant rules regarding offer of judgment.	\$ 385.00	0.40	\$ 154.00
10/11/2024	Rafael Bultz	Email to client D. O'Neal regarding the offer of judgment settlement offer from opposing party.	\$ 385.00	0.30	\$ 115.50
10/11/2024	Rafael Bultz	Email to expert witness R. Worth regarding the logistics of his appearance for trial.	\$ 385.00	0.30	\$ 115.50
10/14/2024	Rafael Bultz	Drafting new subpoenas to Forrest Dawson and receptionist Jennifer.	\$ 385.00	0.70	\$ 269.50
10/14/2024	Rafael Bultz	Revisions to trail witness subpoenas.	\$ 385.00	0.90	\$ 346.50
10/14/2024	Rafael Bultz	Call Process Serve Timofey regarding his appearance as a witness at trial.	\$ 385.00	0.30	\$ 115.50
10/14/2024	Rafael Bultz	Preparation for call with process server Timofey regarding his service job from the state case.	\$ 385.00	0.20	\$ 77.00
10/14/2024	Rafael Bultz	Draft of subpoena to State Farm to issue a representative as speaking agent.	\$ 385.00	0.40	\$ 154.00
10/14/2024	Tracy Pearson	Meet and confer regarding case strategy and update with Seattle litigation team.	\$ 595.00	0.10	\$ 59.50
10/14/2024	William Adan	Meet with DH and RB. Communicated with client.	\$ 195.00	0.10	\$ 19.50
10/14/2024	William Adan	Communicated with trial witness.	\$ 195.00	0.10	\$ 19.50
10/14/2024	William Adan	Met with DH and RB. Order process services for trial witnesses.	\$ 195.00	0.30	\$ 58.50
10/14/2024	William Adan	Met with RB, DH, AR and TP on case strategy	\$ 195.00	0.10	\$ 19.50
10/14/2024	William Adan	Met with DH 2x. Inquiry on authorized acceptance of service.	\$ 195.00	0.10	\$ 19.50
10/14/2024	Dubs Herschlip	MEET WITH RB, WA AND AR TO DISCUSS CASE AND ASSIGN TASKS.	\$ 550.00	0.40	\$ 220.00
10/14/2024	Dubs Herschlip	REVIEW AND REVISE SUBPOENAS TO FORREST GRIFFIN AND JENNIFER. RECEIVE AND REPLY TO EMAIL FROM RB.	\$ 550.00	0.10	\$ 55.00
10/14/2024	Dubs Herschlip	MEET WITH WA TO CONFIRM SERVICE.	\$ 550.00	0.10	\$ 55.00
10/14/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM WA AND PROCESS SERVER. [N.C.] X3	\$ 550.00	0.10	\$ 55.00
10/14/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM CITY OF KENT POLICE OFFICER.	\$ 550.00	0.10	\$ 55.00
10/14/2024	Dubs Herschlip	REVIEW EMAIL FROM THE COURT CLERK WITH TRIAL PROCEDURES AND JURY INSTRUCTIONS ATTACHED.	\$ 550.00	0.10	\$ 55.00
10/14/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS TO AND FROM RB AND EXPERT. EMAIL TO EXPERT. X4	\$ 550.00	0.10	\$ 55.00
10/14/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM OC WITH OFFER OF JUDGMENT, AND FROM RB AND CLIENT. X5	\$ 550.00	0.10	\$ 55.00
10/14/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM EXPERT.	\$ 550.00	0.10	\$ 55.00
10/14/2024	Alex Rowan	Discussing case strategy and finding a time to meet to discuss drafting opening and closing statements.	\$ 395.00	0.10	\$ 39.50
10/15/2024	Alex Rowan	Researching case law on objections to deposition testimony.	\$ 395.00	0.60	\$ 237.00

10/15/2024	Alex Rowan	Researching case law in the 9th circuit and in the Western District of Washington on Fed. R. Civ. P. 32(d)(4)	\$ 395.00	0.30	\$ 118.50
10/15/2024	Alex Rowan	Researching case law in the 9th circuit and in the Western District of Washington on Fed. R. Civ. P. 32(d)(3)(B)	\$ 395.00	0.30	\$ 118.50
10/15/2024	Alex Rowan	Drafting e-mail summarizing findings to partner D. Herschlip on deposition objections.	\$ 395.00	0.20	\$ 79.00
10/15/2024	Alex Rowan	Corresponding with associate R. Bultz on availability and cost of deposition transcript	\$ 395.00	0.20	\$ 79.00
10/15/2024	Alex Rowan	Researching the local rules for the Western District of Washington in preparation for drafting the response to defendant's motions in limine	\$ 395.00	0.30	\$ 118.50
10/15/2024	Alex Rowan	Discussing the organization and drafting the pretrial brief with partner D. Herschlip and associate R. Bultz, as well as fitting into broader case strategy.	\$ 395.00	0.80	\$ 316.00
10/15/2024	Alex Rowan	Discussing the organization and drafting of the responses to the Defendants' motions in limine, and to what extent we oppose them, with partner D. Herschlip and associate R. Bultz, as well as how Defendants' arguments fit into broader case strategy.	\$ 395.00	0.80	\$ 316.00
10/15/2024	Alex Rowan	Researching Judge Evanson's chamber procedures on trial for drafting oppositions to Defendant's motions in limine	\$ 395.00	0.20	\$ 79.00
10/15/2024	Alex Rowan	Researching case law on denials of motions in limine in the Ninth Circuit and the Western District of Washington.	\$ 395.00	0.40	\$ 158.00
10/15/2024	Alex Rowan	Drafting an opposition to the Defendant's motions in limine.	\$ 395.00	2.60	\$ 1,027.00
10/15/2024	Alex Rowan	Researching the definition of an essential witness in the ninth circuit.	\$ 395.00	0.40	\$ 158.00
10/15/2024	Alex Rowan	Researching case law on motions in limine about litigation-induced stress in the ninth circuit	\$ 395.00	0.40	\$ 158.00
10/15/2024	Alex Rowan	Researching case law on reasonableness of claim and discussing case strategy and reorganizing pretrial brief with partner D. Herschlip and R. Bultz	\$ 395.00	0.70	\$ 276.50
10/15/2024	Alex Rowan	Revising the opposition to the motions in limine	\$ 395.00	1.30	\$ 513.50
10/15/2024	Alex Rowan	Finalizing and preparing the response to Defendant's motions in limine for filing.	\$ 395.00	0.20	\$ 79.00
10/15/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM RB RE NOTICE TO DEFENDANT TO APPEAR AT TRIAL.	\$ 550.00	0.10	\$ 55.00
10/15/2024	Dubs Herschlip	TEXT AR, RB AND WA RE TRIAL BRIEF, VOIRE DIRE AND OBJECTION TO TRANSCRIPTS. DRAFT PROPOSED VOIRE DIRE.	\$ 550.00	1.00	\$ 550.00
10/15/2024	Dubs Herschlip	PROVIDE LEGAL BRIEFS AND CITATIONS OF IFCA TO RB.	\$ 550.00	0.50	\$ 275.00
10/15/2024	Dubs Herschlip	REVISE VOIRE DIRE.	\$ 550.00	0.80	\$ 440.00
10/15/2024	Dubs Herschlip	MEET WITH RB AND WA TO DISCUSS TRIAL APPEARANCE, AND PREP.	\$ 550.00	0.30	\$ 165.00
10/15/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAIL FROM AR ON DEPOSITION OBJECTIONS.	\$ 550.00	0.10	\$ 55.00
10/15/2024	Dubs Herschlip	TEAMS CALL WITH RB AND AR TO REVISE TRIAL BRIEF AND RESPONSE TO MOTIONS IN LIMINE. REVISE REQUEST FOR REMOTE TESTIMONY OF EXPERT ON REBUTTAL.	\$ 550.00	1.30	\$ 715.00
10/15/2024	Dubs Herschlip	TEAMS CALL WITH RB AND AR. LEGAL RESEARCH OF IFCA AND "UNREASONABLE DENIAL" STANDARD.	\$ 550.00	0.80	\$ 440.00
10/15/2024	Dubs Herschlip	REVIEW AND REVISE TRIAL BRIEF AND RESPONSE TO MOTIONS IN LIMINE.	\$ 550.00	1.90	\$ 1,045.00
10/15/2024	Rafael Bultz	Draft of Plaintiff's pretrial brief.	\$ 385.00	3.60	\$ 1,386.00
10/15/2024	Rafael Bultz	Call with attorneys A. Rowan and D. Herschlip regarding logistics and strategy of case for trial.	\$ 385.00	1.60	\$ 616.00
10/15/2024	Rafael Bultz	Draft of pretrial brief.	\$ 385.00	7.20	\$ 2,772.00
10/15/2024	Rafael Bultz	Email to opposing counsel J. Hicks with copies of the filed Plaintiff's Pretrial Brief and Responses to Def's Motions in Limine.	\$ 385.00	0.10	\$ 38.50
10/15/2024	William Adan	Communicated with attorney Rafael Bultz. Communicated with Opposing Counsel James Hicks	\$ 195.00	0.20	\$ 39.00
10/15/2024	William Adan	I have revised the numbering on our Voire Dire and declaration of mailing.	\$ 195.00	0.50	\$ 97.50
10/15/2024	William Adan	Research pre-trial procedures to see if we need to file this.	\$ 195.00	0.20	\$ 39.00
10/15/2024	William Adan	Communicated with the court with revised document.	\$ 195.00	0.20	\$ 39.00
10/15/2024	William Adan	Communicated with the process server and attorney DH.	\$ 195.00	0.20	\$ 39.00
10/15/2024	William Adan	Communicated with attorney DH. Drafted request to the court for approval.	\$ 195.00	0.40	\$ 78.00
10/15/2024	William Adan	Communicated with attorney DH and client Oneal.	\$ 195.00	0.20	\$ 39.00
10/16/2024	William Adan	Communicated with attorney DH and attorney Victoria Robben.	\$ 195.00	0.10	\$ 19.50
10/16/2024	William Adan	Communicated with DH and RB and opposing counsel James Hicks.	\$ 195.00	0.20	\$ 39.00
10/16/2024	Rafael Bultz	Call with attorneys A.Rowan, D. Herschlip, and client D. O'Neal about judgment offer and preparing for trial.	\$ 385.00	0.50	\$ 192.50
10/16/2024	Rafael Bultz	Email to opposing counsel associate S. Marrin regarding pretrial conference on 10/21.	\$ 385.00	0.10	\$ 38.50
10/16/2024	Rafael Bultz	Email to opposing counsel associate S. Marrin regarding pretrial conference on 10/21.	\$ 385.00	0.10	\$ 38.50
10/16/2024	Rafael Bultz	Started preparing and drafting outline for pretrial conference on 10/21.	\$ 385.00	1.20	\$ 462.00
10/16/2024	Alex Rowan	Meeting with client, partner D. Herschlip, and associate R. Bultz about trial testimony.	\$ 395.00	0.30	\$ 118.50
10/16/2024	Dubs Herschlip	T.C. WITH CLIENT, RB AND AR.	\$ 550.00	0.50	\$ 275.00
10/16/2024	Dubs Herschlip	PREP FOR VIDEO TRAINING IN COURT THIS AFTERNOON.	\$ 550.00	0.20	\$ 110.00

10/17/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM RB WITH PROOFS OF CLIENT'S INSURANCE PAYMENTS ATTACHED.	\$ 550.00	0.10	\$ 55.00
10/17/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS PREPARATIONS FOR PRE-TRIAL CONFERENCE.	\$ 550.00	0.20	\$ 110.00
10/17/2024	Dubs Herschlip	T.C. WITH PROSECUTING ATTORNEY FOR CITY OF KENT AND COMMANDER JOHNSON WITH RB.	\$ 550.00	0.80	\$ 440.00
10/17/2024	Dubs Herschlip	MEET WITH RB AND REVIEW EVIDENCE FOR INSURER'S REQUEST FOR A POLIE REPORT.	\$ 550.00	0.50	\$ 275.00
10/17/2024	Dubs Herschlip	RECEIVE AND REVIEW EMAILS FROM RB AND OC. RECEIVE AND REPLY TO TEXTS FROM RB. T.C. WITH RB.	\$ 550.00	0.40	\$ 220.00
10/17/2024	Rafael Bultz	Email to opposing counsel Hicks with authority of the subpoena we sent to bring document to trial.	\$ 385.00	0.30	\$ 115.50
10/17/2024	Rafael Bultz	Research into Rule 45 and applicability to current subpoena issue.	\$ 385.00	0.70	\$ 269.50
10/17/2024	Rafael Bultz	Email to opposing counsel Hicks regarding the applicability of Rule 45 for our subpoena disagreement.	\$ 385.00	0.10	\$ 38.50
10/17/2024	Rafael Bultz	Call with attorney D. Herschlip and Commander Johnson of the Kent Police Department.	\$ 385.00	0.80	\$ 308.00
10/17/2024	Rafael Bultz	Review of State Farm client file on D. O'Neal with attorney D. Herschlip.	\$ 385.00	0.50	\$ 192.50
10/17/2024	Rafael Bultz	Email draft to attorney D. Herschlip regarding subpoena to State Farm.	\$ 385.00	0.10	\$ 38.50
10/17/2024	Rafael Bultz	Email to opposing counsel J. Hicks regarding subpoena to State Farm.	\$ 385.00	0.10	\$ 38.50
10/17/2024	Rafael Bultz	Started drafting outline for pretrial conference on 10/21.	\$ 385.00	2.20	\$ 847.00
10/17/2024	William Adan	Communicated with attorney Victoria Robben.	\$ 195.00	0.10	\$ 19.50
10/17/2024	William Adan	Communicated with attorney DH. Prepared Exhibits and exhibits list draft for approval.	\$ 195.00	2.70	\$ 526.50
10/18/2024	William Adan	Communicated with RB and DH. Prepare final trial exhibit production. Travel to and from vendor to place job production.	\$ 195.00	2.20	\$ 429.00
10/18/2024	William Adan	Communicated with attorney RB.	\$ 195.00	0.10	\$ 19.50
10/18/2024	Rafael Bultz	Call with opposing counsel Hicks regarding our rule 45 subpoena.	\$ 385.00	0.30	\$ 115.50
10/18/2024	Rafael Bultz	Email to opposing counsel Hicks memorializing what was discussed in our rule 45 subpoena meeting.	\$ 385.00	0.40	\$ 154.00
10/18/2024	Rafael Bultz	Draft of new rule 45 subpoena for opposing party to appear and testify at trial.	\$ 385.00	0.30	\$ 115.50
10/18/2024	Rafael Bultz	Email to opposing counsel Hicks following up on meeting.	\$ 385.00	0.30	\$ 115.50
10/18/2024	Rafael Bultz	Email to opposing counsel Hicks with new draft of rule 45 subpoena for their client to appear at trial.	\$ 385.00	0.20	\$ 77.00
10/18/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM WA WITH EXHIBITS AND PRODUCTION OF TRIAL BINDERS.	\$ 550.00	0.10	\$ 55.00
10/18/2024	Dubs Herschlip	MEET WITH WA TO REVIEW TRIAL BINDERS AND COPYING.	\$ 550.00	0.20	\$ 110.00
10/18/2024	Dubs Herschlip	MEET WITH RB TO REVIEW POLICE REPORT ABOUT JOHN MUSE SENT OVER BY CDR JOHNSON TODAY, AND POTENTIAL METHODS FOR ADMISSION.	\$ 550.00	0.50	\$ 275.00
10/18/2024	Dubs Herschlip	PRACTICE DIRECT AND CROSS OF STATE FARM, THEIR EXPERT AND OUR EXPERT.	\$ 550.00	0.40	\$ 220.00
10/18/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAILS FROM PROCESS SERVER WITH PROOFS OF SERVICE ON FOREST GRIFFIN AND HIS EMPLOYEE JENNIFER ATTACHED. EMAIL WA.	\$ 550.00	0.10	\$ 55.00
10/18/2024	Dubs Herschlip	T.C. WITH RB RE MEET AND CONFER WITH OC. RECEIVE AND REVIEW 8 EMAILS FROM RB AND OC RE NOTICE FOR HIS CLIENT TO APPEAR AT TRIAL.	\$ 550.00	0.20	\$ 110.00
10/20/2024	Rafael Bultz	Draft outline for pretrial conference for Monday, 10.21.	\$ 385.00	3.90	\$ 1,501.50
10/21/2024	Rafael Bultz	Drafting of direct and cross-examination for trial the next week.	\$ 385.00	3.20	\$ 1,232.00
10/21/2024	Rafael Bultz	Email to commander Johnson acknowledging the email sent to us.	\$ 385.00	0.10	\$ 38.50
10/21/2024	Rafael Bultz	Email to client Debra O'Neal with copy of new police report from Commander Johnson.	\$ 385.00	0.10	\$ 38.50
10/21/2024	Rafael Bultz	Email to expert witness Robert Worth with copy of new police report from Commander Johnson.	\$ 385.00	0.10	\$ 38.50
10/21/2024	Dubs Herschlip	TRAVEL TO OFFICE TO PRINT OUT PRE-TRIAL STATEMENTS, VOIRE DIRE, PROPOSED PRETRIAL ORDER AND EXHIBITS X4. PREPARE FOR HEARING WITH RB DURING TRAVEL TO AND FROM DISTRICT COURTHOUSE. INTRODUCE WA, RB TO THE COURT. PRESENT PROPOSED VOIRE DIRE, JURY INSTRUCTIONS, MIL AND ARGMENTS. MEET WITH RB AND WA TO RECAP.	\$ 550.00	6.90	\$ 3,795.00
10/21/2024	Dubs Herschlip	Review and recap hearing notes and assignments. Receive and review email from OC. Email RB and AR assignments and updates. x3 Text WA.	\$ 550.00	0.30	\$ 165.00
10/22/2024	Dubs Herschlip	Receive and review emails from OC, RB and the court with exhibit lists, and orders. Text AR and RB work assignments.	\$ 550.00	0.40	\$ 220.00
10/22/2024	Dubs Herschlip	T.C. with RB re potential witness testimony.	\$ 550.00	0.10	\$ 55.00
10/22/2024	Dubs Herschlip	TEXTS TO AND FROM AR, RB AND WA REGARDING TRIAL PREPARATION TASKS INCLUDING OPENING POWER POINT, DIRECTS, CROSSES, AND LEGAL RESEARCH ON AVAILABILITY OF EMOTIONAL DISTRESS AND LITIGATION-RELATED STRESS AS DAMAGES.	\$ 550.00	0.20	\$ 110.00

10/22/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM AR WITH RESEARCH ON EMOTIONAL DISTRESS DAMAGES BEING ALLOWED UNDER IFCA WITH DIRECTIONS TO FOCUS ON LITIGATION-RELATED STRESS.	\$ 550.00	0.30	\$ 165.00
10/22/2024	Alex Rowan	Reviewing notes taken on the pretrial conference and order.	\$ 395.00	0.40	\$ 158.00
10/22/2024	Alex Rowan	Corresponding with partner D. Herschlip on scope of research to be done on Washington's IFCA or CPA.	\$ 395.00	0.10	\$ 39.50
10/22/2024	Alex Rowan	Researching case law on whether economic damages are allowed under IFCA in Washington.	\$ 395.00	0.80	\$ 316.00
10/22/2024	Alex Rowan	Researching case law on whether economic damages are allowed under IFCA in the federal district for the Western District of Washington.	\$ 395.00	1.30	\$ 513.50
10/22/2024	Alex Rowan	Researching whether the Washington appellate case is binding on the Western District of Washington.	\$ 395.00	0.40	\$ 158.00
10/22/2024	Alex Rowan	Drafting memorandum to partner D. Herschlip on whether economic damages are recoverable under IFCA.	\$ 395.00	0.40	\$ 158.00
10/22/2024	Alex Rowan	Outlining potential issue found in negative case law to partner D. Herschlip.	\$ 395.00	0.20	\$ 79.00
10/22/2024	Rafael Bultz	Preparing of notes and documents for trial next week.	\$ 385.00	3.60	\$ 1,386.00
10/22/2024	Rafael Bultz	Review of our exhibit list to prepare to send to Court.	\$ 385.00	1.20	\$ 462.00
10/22/2024	Rafael Bultz	Draft of plaintiff's exhibit list to send to Court deputy.	\$ 385.00	0.50	\$ 192.50
10/22/2024	Rafael Bultz	Email of plaintiff's exhibit list to Court deputy.	\$ 385.00	0.10	\$ 38.50
10/23/2024	Rafael Bultz	Revision of Parties' Pretrial Order.	\$ 385.00	1.50	\$ 577.50
10/23/2024	Rafael Bultz	Revision of Plaintiff's Exhibit List.	\$ 385.00	1.90	\$ 731.50
10/23/2024	Rafael Bultz	Prepared and filed Plaintiff's Praecipe to Trial Brief to Court.	\$ 385.00	1.10	\$ 423.50
10/23/2024	Rafael Bultz	Email to opposing counsel Hicks accepting service for rule 45 subpoena.	\$ 385.00	0.10	\$ 38.50
10/23/2024	Rafael Bultz	Emails to opposing counsel Hicks and paralegal W. Adan with explanation of current status of Plaintiffs Exhibit list and the revised pretrial order.	\$ 385.00	0.30	\$ 115.50
10/23/2024	William Adan	Communicated with opposing counsel's office. Communicated with attorney RB.	\$ 195.00	0.30	\$ 58.50
10/23/2024	William Adan	Communicated with attorney RB.	\$ 195.00	0.10	\$ 19.50
10/23/2024	William Adan	Communicated with attorney DH, RB AR. Revised legal documents. Communicated with the court.	\$ 195.00	0.30	\$ 58.50
10/23/2024	William Adan	Communicated with attorney RB. Revised Exhibit list.	\$ 195.00	0.30	\$ 58.50
10/23/2024	Dubs Herschlip	TEAMS CALL WITH AR, RB AND WA TO DISCUSS TRIAL PREP AND DELEGATE DIRECT OF EXPERT WORTH AND CROSS OF DEFENSE EXPERT WITH CITATIONS TO EXPERT REPORT PER COURT'S ORDER, LEGAL BRIEFING OF EMOTIONAL DAMAGES AND LITIGATION-RELATED STRESS, PREP OF CROSS OF DEFENSE REPRESENTATIVE, AS WELL AS ACCEPTANCE OF SERVICE FOR THEIR REPRESENTATIVE AND PREPARATION OF ANTICIPATED OBJECTIONS AND RESPONSES TO OBJECTIONS.	\$ 550.00	0.30	\$ 165.00
10/23/2024	Dubs Herschlip	RECEIVE AND REPLY TO EMAIL FROM AR. REVISE BRIEF ON NONECONOMIC DAMAGES. LEGAL RESEARCH. EMAIL REDLINE TO AR, RB AND WA.	\$ 550.00	0.80	\$ 440.00
10/23/2024	Dubs Herschlip	T.C. WITH RB TO DISCUSS OC'S OBJECTIONS TO OUR EXHIBITS, PARTICULARLY THE CLAIMS FILE, AND HIS OFFER TO STIPULATE TO THE AUTHENTICITY OF THEIR CLAIMS FILE.	\$ 550.00	0.20	\$ 110.00
10/23/2024	Alex Rowan	Researching whether noneconomic damages for emotional stress related or incident to litigation are allowed under the IFCA in the Ninth circuit and under state law.	\$ 395.00	0.80	\$ 316.00
10/23/2024	Alex Rowan	Drafting the brief answer and discussion for the second section of the legal brief on noneconomic damages.	\$ 395.00	0.50	\$ 197.50
10/23/2024	Alex Rowan	Corresponding with partner D. Herschlip and associate R. Bultz about the legal brief and requesting revisions.	\$ 395.00	0.10	\$ 39.50
10/23/2024	Alex Rowan	Creating a new document based on old template for the legal brief on noneconomic damages	\$ 395.00	0.10	\$ 39.50
10/23/2024	Alex Rowan	Drafting the introduction to the legal brief on noneconomic damages	\$ 395.00	0.10	\$ 39.50
10/23/2024	Alex Rowan	Drafting the questions presented for the legal brief on noneconomic damages.	\$ 395.00	0.10	\$ 39.50
10/23/2024	Alex Rowan	Drafting the brief answer and discussion for the first section of the legal brief on noneconomic damages.	\$ 395.00	0.50	\$ 197.50
10/23/2024	Alex Rowan	Researching whether litigation-induced stress is allowed under noneconomic damages.	\$ 395.00	0.30	\$ 118.50
10/23/2024	Alex Rowan	Discussing assignments for trial preparation with partner D. Herschlip and associate R. Bultz.	\$ 395.00	0.20	\$ 79.00
10/23/2024	Alex Rowan	Amending the brief on noneconomic damages and its citations in accordance with the bluebook.	\$ 395.00	0.20	\$ 79.00
10/23/2024	Alex Rowan	Corresponding with partner D. Herschlip and paralegal W. Adan about the amendment to the brief on noneconomic damages.	\$ 395.00	0.10	\$ 39.50
10/24/2024	Dubs Herschlip	Receive and reply to email from expert Worth with logistics of his arrival. [n.c.]	\$ 550.00	0.10	\$ 55.00
10/24/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS STIPULATION TO OC'S EXHIBITS.	\$ 550.00	0.20	\$ 110.00
10/24/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS FOREST DAWSON'S RESPONSE TO SUBPOENA BY PHONE.	\$ 550.00	0.20	\$ 110.00

10/24/2024	Dubs Herschlip	MEET WITH RB AND WA TO DISCUSS OC'S STIPULATION TO DEFENDANT'S CLAIMS FILE AS EXHIBIT, AND NEXT STEPS TO REPLACE EXHIBITS AND LIST OF EXHIBITS TO BE PROVIDED TO COURT AND OC IN SUBSTITUTION OF PLAINTIFF'S EXHIBITS.	\$ 550.00	0.40	\$ 220.00
10/24/2024	Rafael Bultz	Discussion with Dubs and Will about exhibits for trial next week.	\$ 385.00	0.80	\$ 308.00
10/24/2024	Rafael Bultz	Call with state farm agent forrest dawson.	\$ 385.00	0.30	\$ 115.50
10/24/2024	Rafael Bultz	Email to Forrest Dawson.	\$ 385.00	0.10	\$ 38.50
10/24/2024	Rafael Bultz	Email to client regarding her arrival in seattle.	\$ 385.00	0.30	\$ 115.50
10/24/2024	Rafael Bultz	Email to OC with new versions of documents to be submitted to court.	\$ 385.00	0.50	\$ 192.50
10/24/2024	Rafael Bultz	Revisions of parties' pretrial order and plaintiff's exhibit list.	\$ 385.00	0.30	\$ 115.50
10/24/2024	Rafael Bultz	Drafting of direct and cross-examination for trial the next week.	\$ 385.00	2.80	\$ 1,078.00
10/25/2024	Rafael Bultz	Revise plaintiff's trial exhibit list Word doc.	\$ 385.00	0.80	\$ 308.00
10/25/2024	Rafael Bultz	Email to court with new version of list and question for A. Rowan to attend.	\$ 385.00	0.20	\$ 77.00
10/25/2024	Rafael Bultz	Email to expert witness Worth about picking up from airport.	\$ 385.00	0.10	\$ 38.50
10/25/2024	Rafael Bultz	Email to expert witness about setting up meeting on Saturday for trial prep.	\$ 385.00	0.10	\$ 38.50
10/25/2024	William Adan	Communicated with attorney DH. Prepared trial supplemental exhibit production for vendor. Traveled to and from vendor.	\$ 195.00	1.50	\$ 292.50
10/25/2024	Dubs Herschlip	RECEIVE AND REVIEW COURT'S PRELIMINARY JURY INSTRUCTIONS AND ORDER ON MOTIONS IN LIMINE. RE-READ COURT'S PRIOR ORDERS. EDIT DIRECTS AND CROSSES.	\$ 550.00	2.00	\$ 1,100.00
10/25/2024	Dubs Herschlip	Draft direct of Debra O'Neal, Direct of SF's representative, and opening.	\$ 550.00	2.00	\$ 1,100.00
10/25/2024	Dubs Herschlip	Meet with client to review exhibits, trial procedure, and direct exam testimony.	\$ 550.00	5.00	\$ 2,750.00
10/26/2024	Dubs Herschlip	Revise opening.	\$ 550.00	1.00	\$ 550.00
10/26/2024	Dubs Herschlip	Meet with RB, AR and expert Robert Worth. Revise direct examination of Debra, expert and process server Timofey Salmoyenko. Draft cross of Ebony Culpepper, and insurance representative. Notate relevant portions of exhibits for presentation at trial.	\$ 550.00	2.40	\$ 1,320.00
10/26/2024	Dubs Herschlip	CONTINUE TO REVIEW AND NOTATE EVIDENCE.	\$ 550.00	1.50	\$ 825.00
10/26/2024	Rafael Bultz	Drafting of direct and cross-examination for trial the next week.	\$ 385.00	4.10	\$ 1,578.50
10/26/2024	Rafael Bultz	TEAMS meet with attorneys D. Herschlip A. Rowan and expert witness Bob Worth.	\$ 385.00	2.30	\$ 885.50
10/27/2024	Rafael Bultz	Drafting of direct and cross-examination for trial the next week.	\$ 385.00	2.60	\$ 1,001.00
10/27/2024	Rafael Bultz	Preparing notes and exhibits for trial starting monday.	\$ 385.00	3.10	\$ 1,193.50
10/27/2024	Rafael Bultz	Revisions and preparation of opening statement for first day of trial.	\$ 385.00	2.10	\$ 808.50
10/27/2024	Dubs Herschlip	CONTINUE ANNOTATING EXHIBITS. REVISE DIRECT OF DEBRA, DIRECT OF SF REP, DIRECT OF BOB WORTH, CROSS OF SF REPRESENTATIVE. PRE-TRIAL PREP. EMAILS TO AND FROM EXPERT, CLIENT AND TEAM.	\$ 550.00	7.00	\$ 3,850.00
10/27/2024	Dubs Herschlip	Travel to hotel near courthouse. Continue revising directs and crosses.	\$ 550.00	4.00	\$ 2,200.00
10/27/2024	Alex Rowan	Meeting with partner D. Herschlip, R. Bultz, and expert witness R. Worth.	\$ 395.00	2.40	\$ 948.00
10/28/2024	Alex Rowan	Discussing testimony and opening statements raised in the first day of trial with associate R. Bultz to highlight issues to be addressed in future testimony and in closing.	\$ 395.00	1.10	\$ 434.50
10/28/2024	Alex Rowan	Meeting with partner D. Herschlip, associate R. Bultz and expert witness after first day of trial.	\$ 395.00	0.50	\$ 197.50
10/28/2024	Alex Rowan	Revising and drafting the direct for Elvie Powers	\$ 395.00	2.20	\$ 869.00
10/28/2024	Alex Rowan	Corresponding about the Elvie Powers direct with partner D. Herschlip and R. Bultz, and requesting review	\$ 395.00	0.20	\$ 79.00
10/28/2024	Alex Rowan	Analyzing Exhibit 43 for citations to impeach witnesses.	\$ 395.00	0.80	\$ 316.00
10/28/2024	Alex Rowan	Opening statements of State Farm, O'Neal, and first day of direct of O'Neal	\$ 395.00	3.60	\$ 1,422.00
10/28/2024	Dubs Herschlip	Prepare for trial. Conduct voire dire, opening and direct of Debra O'Neal. Meet with client and team. Revise direct of DO, and direct of OP.	\$ 550.00	13.20	\$ 7,260.00
10/28/2024	Rafael Bultz	Transportation to and from Federal Courthouse for trial.	\$ 385.00	1.00	\$ 385.00
10/28/2024	Rafael Bultz	Attending day one of trial.	\$ 385.00	8.00	\$ 3,080.00
10/28/2024	Rafael Bultz	Meeting with attorneys D. Herschlip and A. Rowan to recap and prepare for next day of trial.	\$ 385.00	1.20	\$ 462.00
10/28/2024	Rafael Bultz	Drafting, reviewing, and preparing for day 1 and 2 of trial.	\$ 385.00	4.90	\$ 1,886.50
10/28/2024	William Adan	Travel to and from Federal Court house to serve as trial tech paralegal for client's legal team day 1.	\$ 195.00	10.00	\$ 1,950.00
10/29/2024	William Adan	Travel to and from Federal Court house to serve as trial tech paralegal for client's legal team day 2.	\$ 195.00	10.00	\$ 1,950.00
10/29/2024	Rafael Bultz	Travel to and from Federal Courthouse for trial.	\$ 385.00	1.00	\$ 385.00
10/29/2024	Rafael Bultz	Pretrial meeting with D. Herschlip and A. Rowan.	\$ 385.00	1.90	\$ 731.50
10/29/2024	Rafael Bultz	Attending day 2 of trial.	\$ 385.00	8.00	\$ 3,080.00
10/29/2024	Rafael Bultz	Post day 2 trial meeting.	\$ 385.00	1.10	\$ 423.50
10/29/2024	Rafael Bultz	Reviewing, drafting, and preparing for next day of trial.	\$ 385.00	4.60	\$ 1,771.00

10/29/2024	Dubs Herschlip	Preare for day 2 of trial. Meet with trial team. Continue direct of DO. Direct of OP, Elvie Owns-Powers. Revise direct of Elvie Owns-Powers. Receive and reply to texts and emails from team.	\$ 550.00	11.10	\$ 6,105.00
10/29/2024	Alex Rowan	Revising the direct of Elvie Owen Powers	\$ 395.00	1.90	\$ 750.50
10/29/2024	Alex Rowan	Corresponding with R. Bultz about the direct of Elvie Owen Powers	\$ 395.00	0.40	\$ 158.00
10/29/2024	Alex Rowan	Corresponding with D. Herschlip about the revised direct of Elvie Owen Powers	\$ 395.00	0.10	\$ 39.50
10/29/2024	Alex Rowan	First half of second day of trial - direct of O'Neal and start of cross	\$ 395.00	2.60	\$ 1,027.00
10/29/2024	Alex Rowan	Meeting with D. Herschlip and R. Bultz to discuss testimony and case strategy	\$ 395.00	1.00	\$ 395.00
10/29/2024	Alex Rowan	Second half of second day of trial - Cross and redirect of plaintiff, and first half of the direct of Elvie Powers	\$ 395.00	3.60	\$ 1,422.00
10/29/2024	Alex Rowan	Meeting with D. Herschlip and R. Bultz after second day of trial to discuss the trial and edits to witness examination.	\$ 395.00	0.20	\$ 79.00
10/30/2024	Alex Rowan	Meeting with D. Herschlip and R. Bultz to discuss testimony and case strategy	\$ 395.00	0.80	\$ 316.00
10/30/2024	Alex Rowan	Second half of day 3 of trial - finish direct of Robert Worth and start of cross of Robert Worth	\$ 395.00	3.80	\$ 1,501.00
10/30/2024	Alex Rowan	First half of day 3 of the trial - pretrial conference, direct of Elvie Owen Powers, and start of direct of Robert Worth.	\$ 395.00	3.00	\$ 1,185.00
10/30/2024	Dubs Herschlip	Continue to prepare for trial. Meet with expert, RB, WA and client. Conduct trial.	\$ 550.00	10.00	\$ 5,500.00
10/30/2024	Dubs Herschlip	Revise cross of Leonhardi. Draft closing.	\$ 550.00	1.20	\$ 660.00
10/30/2024	Rafael Bultz	Travel to and from Federal Courthouse for trial.	\$ 385.00	1.00	\$ 385.00
10/30/2024	Rafael Bultz	Prepare for direct of expert witness Robert Worth.	\$ 385.00	2.60	\$ 1,001.00
10/30/2024	Rafael Bultz	Attended day 3 of trial.	\$ 385.00	8.00	\$ 3,080.00
10/30/2024	Rafael Bultz	After trial meeting with A. Rowan and D. Herschlip.	\$ 385.00	1.30	\$ 500.50
10/30/2024	Rafael Bultz	Reviewing, drafting, and preparing for next day of trial and redirect of Bob Worth.	\$ 385.00	5.10	\$ 1,963.50
10/30/2024	William Adan	Travel to and from Federal Court house to serve as trial tech paralegal for client's legal team day 3.	\$ 195.00	10.00	\$ 1,950.00
10/31/2024	William Adan	Travel to and from Federal Court house to serve as trial tech paralegal for client's legal team day 4.	\$ 195.00	10.00	\$ 1,950.00
10/31/2024	Rafael Bultz	Transportation to and from Federal Courthouse.	\$ 385.00	1.10	\$ 423.50
10/31/2024	Rafael Bultz	Worked on redirect of Robert Worth.	\$ 385.00	2.50	\$ 962.50
10/31/2024	Rafael Bultz	Pretrial meeting with D. Herschlip and A. Rowan.	\$ 385.00	1.10	\$ 423.50
10/31/2024	Rafael Bultz	Attended day 4 of trial.	\$ 385.00	8.00	\$ 3,080.00
10/31/2024	Rafael Bultz	After trial meeting with A. Rowan and D. Herschlip.	\$ 385.00	1.00	\$ 385.00
10/31/2024	Rafael Bultz	Preparation for day 5 of trial, preparing closing and cross of opposing expert witness.	\$ 385.00	4.50	\$ 1,732.50
10/31/2024	Dubs Herschlip	Meet with RB, WA, AR (on teams), and client. Conduct day 4 of trial. Travel back from Courthouse to office. Telephone conference with RB and AR to discuss closing slides, proposed jury instructions and other issues.	\$ 550.00	11.50	\$ 6,325.00
10/31/2024	Dubs Herschlip	Teams conference with RB and AR to revise closing slides, proposed jury instructions and other issues.	\$ 550.00	2.00	\$ 1,100.00
10/31/2024	Alex Rowan	Drafting closing argument, the powerpoint for it, and jury instructions.	\$ 395.00	3.60	\$ 1,422.00
10/31/2024	Alex Rowan	Corresponding with opposing counsel about our powerpoint for closing.	\$ 395.00	0.10	\$ 39.50
10/31/2024	Alex Rowan	Discussing closing argument with attorney D. Herschlip	\$ 395.00	0.50	\$ 197.50
10/31/2024	Alex Rowan	Second half of fourth day of trial - direct and cross of Elvie Owen Powers, start of direct of Leonhardi	\$ 395.00	4.00	\$ 1,580.00
10/31/2024	Alex Rowan	Discussing closing argument with D. Herschlip.	\$ 395.00	0.40	\$ 158.00
10/31/2024	Alex Rowan	Drafting closing argument and slides.	\$ 395.00	1.30	\$ 513.50
10/31/2024	Alex Rowan	Drafting and revising the cross of Leonhardi.	\$ 395.00	0.80	\$ 316.00
10/31/2024	Alex Rowan	First half of fourth day of trial - direct of Timofey S., Robert worth redirect, recross, and re-re-direct	\$ 395.00	2.80	\$ 1,106.00
10/31/2024	Alex Rowan	Researching Rule 50 motions and criminal intent under IFCA	\$ 395.00	1.00	\$ 395.00
11/1/2024	Alex Rowan	Second half of fifth day of trial - arguing and presenting jury instructions, and closing.	\$ 395.00	3.00	\$ 1,185.00
11/1/2024	Alex Rowan	Revising closing argument.	\$ 395.00	2.80	\$ 1,106.00
11/1/2024	Alex Rowan	Creating closing slides PDF for opposing counsel and wiping notes off.	\$ 395.00	0.20	\$ 79.00
11/1/2024	Alex Rowan	Reviewing closing argument with attorney D. Herschlip.	\$ 395.00	0.50	\$ 197.50
11/1/2024	Alex Rowan	Researching cases and model jury instructions on the definition of probability and probable.	\$ 395.00	0.60	\$ 237.00
11/1/2024	Alex Rowan	First half of fifth day of trial - finish direct and cross of Danette Leonhardi, questions from jurors to Ms. Leonhardi.	\$ 395.00	3.40	\$ 1,343.00
11/1/2024	Dubs Herschlip	Prepare for cross of defense expert and closing. Receive and review OC's slides and jury instructions. Issue objection to untimely jury instruction.	\$ 550.00	1.20	\$ 660.00
11/1/2024	Dubs Herschlip	Meet with client, RB, AR and WA. Revise cross of defense expert. Revise opening. Receive and review Special Jury Verdict Form and Final Jury Instructions. Appear for final day. Conduct trial. Closing Arguments. Wait for Jury Verdict.	\$ 550.00	9.50	\$ 5,225.00

11/1/2024	Dubs Herschlip	Travel to and from court house.	\$ 550.00	2.20	\$ 1,210.00
11/1/2024	Rafael Bultz	Transportation to and from court.	\$ 385.00	0.90	\$ 346.50
11/1/2024	Rafael Bultz	Attended final day of trial.	\$ 385.00	7.50	\$ 2,887.50
11/1/2024	Rafael Bultz	Edits to closing and cross of opposing expert witness.	\$ 385.00	2.20	\$ 847.00
11/1/2024	Rafael Bultz	Meeting with attorneys D. Herschlip and A. Rowan regarding next steps from closing.	\$ 385.00	2.20	\$ 847.00
11/1/2024	William Adan	Federal Court Trial day 5 as paralegal tech to legal team.	\$ 195.00	13.00	\$ 2,535.00
11/4/2024	William Adan	Federal Court Trial Day 6.	\$ 195.00	9.50	\$ 1,852.50
11/4/2024	Rafael Bultz	Transportation to and from courthouse.	\$ 385.00	1.10	\$ 423.50
11/4/2024	Rafael Bultz	Attended court for hearing of jury verdict.	\$ 385.00	1.30	\$ 500.50
11/4/2024	Rafael Bultz	Research into attorney's fees for IFCA violation for post-judgement.	\$ 385.00	1.80	\$ 693.00
11/4/2024	Rafael Bultz	Started drafting declaration and cost bill.	\$ 385.00	1.80	\$ 693.00
11/4/2024	Rafael Bultz	Call with expert witness Worth about cost bill and next steps.	\$ 385.00	0.30	\$ 115.50
11/4/2024	Dubs Herschlip	Travel to and from court house.	\$ 550.00	2.10	\$ 1,155.00
11/4/2024	Alex Rowan	Trial day 7 - jury deliberations	\$ 395.00	0.60	\$ 237.00

EXHIBIT B

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

DR. ALIANA ROSE and DAVID CLARK,

Plaintiffs,

v.

AMERICAN FAMILY MUTUAL
INSURANCE COMPANY, S.I., a Foreign
Corporation and WASHINGTON WATER
RESTORATION, INC., d/b/a
WASHINGTON WATER DAMAGE &
CLEANING SERVICES, a Washington
Corporation,

Defendants.

NO. 2:19-cv-01988-RSM

DECLARATION OF FRANKLIN D.
CORDELL

Franklin D. Cordell makes the following declaration from personal knowledge:

1. I am a partner at the firm of Gordon Tilden Thomas & Cordell, LLP, located at 600 University Street, Suite 2915, Seattle, Washington. I have been practicing law since 1991. After serving as a law clerk to Hon. H. Emory Widener of the U.S. Court of Appeals for the Fourth Circuit, I spent four years as an associate working in the Insurance and Litigation practice groups in the Washington D.C. office of Covington & Burling, LLP.

I. EXPERT QUALIFICATIONS

2. I began my Washington State practice as an associate at the firm then known as Gordon Murray Tilden in 1996. I became a partner of that firm in 1998 (our firm is now known as Gordon Tilden Thomas & Cordell, LLP) and am now our Managing Partner. My CV is attached at Exhibit A to this declaration.

3. Throughout my career, my practice has been limited to business litigation, with a focus on representing policyholders in commercial insurance coverage disputes. Although I handle some non-insurance business litigation, I have practiced mainly in the insurance coverage arena since 1996. My insurance coverage practice is limited to representing policyholders and insurers that are asserting claims in the posture of a policyholder. In the latter vein, insurers have hired me to assert claims for equitable contribution against a co-insurer or claims under the insurer's own errors and omissions insurance or reinsurance. My recent clients of this type have included PEMCO, ACE/Westchester, Association of Washington Cities, and the Washington State Transportation Insurance Pool.

4. I have handled a broad range of insurance coverage and bad faith cases over the years, and have been involved in many cases that generated notable rulings in Washington. My current and former insurance coverage clients include The Boeing Company, Seattle Children's Hospital System, Weyerhaeuser Company, Puget Sound Energy, Providence St. Joseph's (Swedish Medical Center), Cascade Natural Gas, Advance Auto Parts, Inc., U-Haul International, Ocean Beauty Seafoods, Amgen Corp., HomeStreet, Inc., the State of Washington, the City of Seattle, the City of Bellevue, the City of Yakima, Snohomish County, and King County.

1 5. My role as insurance coverage counsel in connection with liability insurance
2
3 claims, which almost universally involve an insurer paying defense counsel's fees, has given me
4
5 a broad base of knowledge of hourly rates charged by lawyers in Seattle. Also, from time to time
6
7 I am asked to review a fee application being made by policyholder counsel, usually one made
8
9 under the rule in *Olympic Steamship*. These tasks all involve careful review of attorneys' bills
10
11 from a wide range of lawyers and law firms, and evaluation of what is and is not reasonable. I
12
13 have worked with other expert witnesses in disputes involving the reasonableness of attorneys'
14
15 fees; this work included a case that was tried to verdict in King County Superior Court in 2017.
16
17 All these experiences have caused me to be familiar with the prevailing market rates for complex
18
19 civil litigation, and in particular insurance-coverage and bad faith litigation, in Seattle.

20
21 6. I frequently write and speak to various professional organizations on insurance
22
23 coverage and bad-faith topics. My CV includes a list of my publications over the past 10 years.

24
25 7. I have never testified as an expert at trial. In 2019 I gave an expert deposition in
26
27 a coverage and bad faith case being litigated in federal court in Anchorage, Alaska. My expert
28
29 opinions in that case had nothing to do with the reasonableness of attorneys' fees.

30 31 **II. ASSIGNMENT AND WORK PERFORMED**

32
33 8. I have been retained by Plaintiff Litigation Group ("PLG") to provide an opinion
34
35 on the reasonableness of the hourly rates charged by PLG attorneys Isaac Ruiz, Kathryn
36
37 Knudsen, and McKean Evans. I performed several tasks in order to develop my opinion. First, I
38
39 reviewed the complete briefing on Plaintiffs' Supplemental Motion and Declaration in Support
40
41 of Attorney Fees and the complete briefing in the underlying Motion to Remand. I also
42
43 conducted an email survey of a number of other attorneys who represent insureds in coverage
44
45 and bad faith litigation. Finally, I had one substantive conversation with Ms. Knudsen about this

1 case and American Family Mutual Insurance Company (“AFMIC”) objections to Plaintiffs’ Fee
2 application.
3
4

5 **III. OPINIONS**

6
7 9. Plaintiffs seek a fee award based on Mr. Ruiz’s hourly rate of \$600 and Ms.
8 Knudsen’s and Mr. Evans’ of \$475. AFMIC objects to these rates, contending they are
9 unreasonable, and instead asserts that their rates should be set at \$475 per hour and \$310 per
10 hour, respectively. In my opinion, AFMIC’s objection is not well founded. PLG’s actual hourly
11 rates, \$600 and \$475, are entirely reasonable in the Seattle market for legal representation of the
12 type and quality provided by Mr. Ruiz, Ms. Knudsen, and Mr. Evans. I reached this opinion for
13 the following reasons.
14
15
16
17
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19

- 20
21 a. I can say with confidence that PLG’s rates are well within the range of
22 reasonableness. This conclusion is confirmed by an informal survey I conducted
23 this week. I inquired of four Seattle lawyers whose practice and qualifications are
24 similar to those of PLG and Mr. Ruiz, Ms. Knudsen, and Mr. Evans. Those
25 lawyers are Richard Dykstra of Freidman Rubin, Todd Hayes and Greg Harper of
26 Harper & Hayes, and Ian Birk of Keller Rohrback. I also included in this survey
27 my law partner Jeffrey Tilden and myself. The hourly rates reported by those
28 lawyers are as follows: \$475 (two lawyers), \$545, \$550, \$575, and \$675.
29
30 b. Isaac Ruiz and Kathryn Knudsen are among a small handful of the top insurance
31 coverage and bad faith lawyers, representing insureds, in Seattle, and indeed the
32 entire State of Washington. Mr. Ruiz is particularly experienced and
33 accomplished, and is known as one of a very small number of “go-to” lawyers in
34 this practice, particularly when it comes to handling bad-faith claims against
35
36
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45

1 insurers under personal-lines policies, *i.e.*, homeowners and other coverages
2
3 purchased by individuals rather than businesses. Further, Mr. Ruiz is the author
4
5 of a highly respected treatise on Washington's Insurance Fair Conduct Act, and is
6
7 looked to as an authority on a wide range of IFCA and bad-faith topics. Put
8
9 simply, \$600 per hour is an entirely reasonable rate for Mr. Ruiz.

10
11 c. AMFIC cites this Court's September 2017 decision in *IDS Prop. & Cas. Ins. Co.*
12
13 *v. Fellows*, 2017 W.L. 4122565 (W.D. Wash. Sept. 15, 2017), in support of its
14
15 assertion that the appropriate hourly rates are \$475 and \$310, respectively.
16
17 AMFIC's reliance on this decision is misplaced. First, and most importantly, the
18
19 market has changed substantially in the two and half years since the *IDS* decision.
20
21 During that period of time, the strong economy and demand for legal services
22
23 caused our firm's hourly rates, and indeed most rates across the city, to increase
24
25 substantially. Further, during that period Mr. Ruiz and Ms. Knudsen gained
26
27 additional experience and prominence within the legal community, including by
28
29 leaving partnerships at Keller Rohrback firm and founding PLG. Here it is
30
31 notable that the *IDS* decision found a \$600 rate for attorney William Smart to be
32
33 reasonable. Mr. Smart is now an attorney at PLG, and his hourly rate is \$750.
34
35 Finally, in the *IDS* case this Court did not find that the rates sought by Mr. Ruiz
36
37 and Ms. Knudsen at that time were the *maximum* rates that would have been
38
39 reasonable for them; rather, the Court simply approved the rates they were
40
41 charging at that time.

42
43 d. The reasonableness of Ms. Knudsen's \$475 rate is further supported by the recent
44
45 ruling of Hon. Sharon S. Armstrong, Ret. in a JAMS arbitration captioned *Wang*

1 v. *Comcast Corp.*, JAMS Arbitration Case Reference No. 1160023118 (copy
2
3 attached as Exhibit B). Judge Armstrong found Ms. Knudsen's rate of \$475 to be
4
5 reasonable. In my opinion Judge Armstrong's finding is entirely correct.
6

7 e. Mr. Evans' qualifications and experience are comparable to those of Ms.
8
9 Knudsen. His hourly rate of \$475 is reasonable, for the same reasons discussed
10
11 above.
12

13 I declare under penalty of perjury under the laws of the State of Washington that the
14
15 foregoing is true and correct.
16

17 DATED this 27th day of March, 2020.
18

19 By

20 
21

22 Franklin D. Cordell, WSBA #26392
23 Gordon Tilden Thomas & Cordell LLP
24 600 University Street, Suite 2915
25 Seattle, Washington 98101
26 206.467.6477
27 fcordell@gordontilden.com
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EXHIBIT C

Case Number: 21-2-10669-9
Date: September 24, 2024
Serial ID: 24-545796-6524210C7J
Certified By: Catherine Cornwall
King County Clerk, Washington

FILED

2022 JUL 28 03:02 PM
KING COUNTY
SUPERIOR COURT CLERK
E-FILED
CASE #: 21-2-10669-9 KNT

**SUPERIOR COURT OF WASHINGTON
FOR THE COUNTY OF KING**

DEBRA S. O'NEAL

Plaintiff,

v.

FRIENDS & FAMILY MOVING &
STORAGE, INC., a Washington Limited
Liability Corporation, and JOHN MUSE,
Defendants.

No. 21-2-10669-9 KNT**PLAINTIFF'S COST BILL**

Plaintiff submits her Cost Bill for attorney fees incurred to bring this present case for breach of contract, liability under the UCC, and conversion. Costs currently Plaintiff's fees are currently \$10,215.00 and costs are \$386.86, with an estimated \$5,000 in additional fees if the case goes to trial, for a total of \$15,801.86.

My hourly rate of \$350 per hour is reasonable based on my 22 years of experience, the complexity of the case, and that our client, the Petitioner.

Austin Hatcher's hourly rate of \$250 per hour is reasonable based on his years of experience as a practicing attorney in Spokane, his two years of experience as a business consultant, and his six years of experience as a Marine Corps officer, with an occupational specialty of Military Police. His rate is lower than the average hourly rate for an attorney in Washington practicing in civil litigation, which is \$294 per hour.

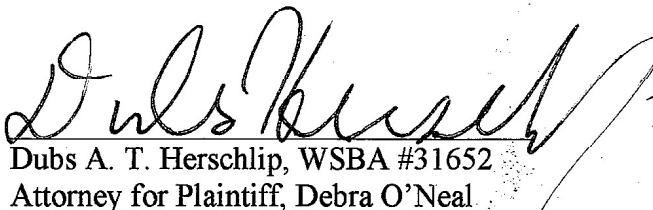
Paralegal Camdyn Joiner's rate of \$150 per hour is reasonable based on her eight years of experience, being a licensed LLLT, and having obtained an Advanced Paralegal Certificate.

PLAINTIFF'S COST BILL. Pg. 1 of 2

DUBS ARI TANNER HERSCHLIP PLLC
627 - 5TH ST., STE 203, MUKILTEO, WA 98275
PHONE: (425) 903-3505
FAX: (425) 298-3918
DUBS@MUKILTEOLAWFIRM.COM
WWW.MUKILTEOLAWFIRM.COM

I certify and declare under penalty of perjury and under the laws of the State of Washington that the detailed billing records attached as Exhibit 1 are contemporaneously kept with legal services and costs unrelated to collecting from these defendants in this matter removed. The invoices list the number of hours worked, the hourly rate for each legal service provider, the type of work performed, and the individual performing the work. A summary is provided below. The work provided was necessarily incurred in this action for the purpose of litigating this proceeding.

DATED this 28th day of July, 2022.


Dubs A. T. Herschlip, WSBA #31652
Attorney for Plaintiff, Debra O'Neal

O'Neal Matter Invoice Summary

<i>Provider</i>	<i>Hours</i>	<i>Rate</i>	<i>Total</i>
<u>Attorney, Dubs Herschlip</u>	<u>23</u>	<u>\$350</u>	<u>\$7,075</u>
<u>Attorney, Austin Hatcher</u>	<u>1.1</u>	<u>\$250</u>	<u>\$275</u>
<u>Paralegal/LLLT, Camdyn Joiner</u>	<u>27</u>	<u>\$150</u>	<u>\$2,865</u>
	<u>Total:</u>		<u>10,215</u>

O'Neal Matter Costs Summary

<i>Item</i>	<i>Cost</i>
<u>Clerk's Fee: Open case (8/12/21)</u>	<u>\$241</u>
<u>Premium Process: Attempted Personal service (8/21/21)</u>	<u>\$75</u>
<u>Clerk's Fee: Ex parte presentation-Motion to Serve by Mail (3/23/22)</u>	<u>\$32.49</u>
<u>USPS cost to mail documents to Defendant (4/5/22)</u>	<u>\$5.88</u>
<u>Clerk's Fee: Ex parte presentation-Motion for Default Order (4/22/22)</u>	<u>\$32.49</u>
<u>Total Costs:</u>	<u>386.86</u>

Date	Description	hrs.	Rate	Total	Billed By
7/7/2022	EMAIL CLIENT.	0.1	\$ 400.00	\$ 40.00	DH
7/7/2022	T.C. WITH CTJ.	0.1	\$ 400.00	\$ 40.00	DH
7/7/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
6/14/2022	T.C. WITH CTJ.	0.1	\$ 400.00	\$ 40.00	DH
6/14/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
6/13/2022	MEET WITH CTJ.	0.1	\$ 400.00	\$ 40.00	DH
6/13/2022	MEET WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
6/2/2022	T.C. WITH CTJ.	0.1	\$ 400.00	\$ 40.00	DH
6/2/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
	RECEIVE AND REVIEW EMAIL FROM CTJ.				
6/2/2022	REVIEW REVISED INVENTORY.	0.2	\$ 400.00	\$ 80.00	DH
6/2/2022	EDIT DOCUMENT.	1	\$ 150.00	\$ 150.00	CJ
6/2/2022	FINALIZE DRAFT AND EMAIL TO CLIENT.	0.1	\$ 150.00	\$ 15.00	CJ
6/1/2022	EDIT APPRAISAL.	1	\$ 150.00	\$ 150.00	CJ
	REVIEW ORDER SETTING TRIAL SCHEDULE AND MATERIALS NEED FOR MOTION FOR				
6/1/2022	DEFAULT JUDGMENT.	0.1	\$ 400.00	\$ 40.00	DH
5/25/2022	T.C. WITH CTJ.	0.1	\$ 350.00	\$ 35.00	DH
5/25/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
	REVIEW CLIENT FILE. SEND COPY OF				
5/23/2022	APPRAISAL TO CLIENT.	0.1	\$ 150.00	\$ 15.00	CJ
5/23/2022	T.C. WITH CTJ. REVIEW FILE.	0.1	\$ 350.00	\$ 35.00	DH
	RECEIVE AND REVIEW EMAIL FROM CTJ.				
5/23/2022	[N.C.]	0.1	\$ -	\$ -	DH
5/20/2022	T.C. WITH MICK. [N.C.]	0.1	\$ -	\$ -	CJ
5/20/2022	MEET WITH MICK.	0.1	\$ 150.00	\$ 15.00	CJ
5/16/2022	MEET WITH CTJ. [N.C.]	0.1	\$ -	\$ -	DH
5/16/2022	MEET WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
5/11/2022	T.C. WITH CTJ.	0.1	\$ 350.00	\$ 35.00	DH
5/11/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
	RECEIVE AND REPLY TO TEXTS FROM CTJ.				
5/11/2022	[N.C.]	0.1	\$ -	\$ -	DH
	T.C. WITH MICK. DRAFT NOTES TO FILE.				
5/11/2022	SEND TEXT TO DATH.	0.1	\$ 350.00	\$ 35.00	DH
	DOWNLOAD PHOTOS (x16) AND				
	DOCUMENT FROM CLIENT. EMAIL TO				
4/29/2022	EXPERT.	0.3	\$ 150.00	\$ 45.00	CJ
4/29/2022	T.C. WITH CTJ.	0.1	\$ 350.00	\$ 35.00	DH
4/29/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
4/28/2022	T.C. WITH CTJ.	0.1	\$ 350.00	\$ 35.00	DH
4/28/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
	MEET WITH EXPERT AND DATH. T.C WITH				
4/26/2022	CLIENT. [N.C.]	1.5	\$ -	\$ -	CJ
	REVIEW VOICEMAIL FROM CLIENT. READ				
	AND RESPOND TO TEXT FROM CLIENT.				
4/26/2022	[N.C.]	0.1	\$ -	\$ -	CJ

EXHIBIT A

4/26/2022	MEET WITH MICK ODELL. T.C. WITH CLIENT.	0.9	\$ 350.00	\$ 315.00	DH
4/25/2022	REVIEW EMAILS FROM DATH, COURT, AND CLIENT. [N.C.]	0.1	\$ -	\$ -	CJ
4/25/2022	SEND EMAIL TO CLIENT. [N.C.]	0.1	\$ -	\$ -	CJ
4/25/2022	RECEIVE AND REVIEW EMAIL FROM COURT WITH ATTACHED ORDER OF DEFAULT. EMAIL TO CLIENT.	0.2	\$ 350.00	\$ 70.00	DH
4/25/2022	RECEIVE AND REVIEW EMAIL FROM CLIENT. [N.C.]	0.1	\$ -	\$ -	DH
4/22/2022	FINALIZE MOTION, DECLARATION OF COUNSEL, AND PROPOSED ORDER. EFILE MOTION AND DECLARATION. SUBMIT DOCUMENTS FOR EX PARTE PRESENTATION (x5). SEND EMAIL TO DATH.	0.8	\$ 150.00	\$ 120.00	CJ
4/22/2022	T.C. WITH CTJ. X2	0.2	\$ 350.00	\$ 70.00	DH
4/22/2022	T.C. WITH DATH. [N.C.] X2	0.2	\$ -	\$ -	CJ
4/22/2022	REVIEW AND REVISE DECLARATION.	0.1	\$ 350.00	\$ 35.00	DH
4/21/2022	BEGIN DRAFTING MOTION.	0.1	\$ 150.00	\$ 15.00	CJ
4/21/2022	CONTINUE DRAFTING MOTION, DECLARATION OF COUNSEL, AND PROPOSED ORDER.	1.9	\$ 150.00	\$ 285.00	CJ
4/21/2022	REVIEW AND REVISE MOTION FOR DEFAULT.	1.2	\$ 350.00	\$ 420.00	DH
3/29/2022	RECEIVE AND REPLY TO EMAIL FROM CTJ WITH ATTACHMENTS.	0.2	\$ 350.00	\$ 70.00	DH
3/29/2022	RECEIVE AND REPLY TO EMAIL FROM CLIENT.	0.1	\$ 350.00	\$ 35.00	DH
3/28/2022	DRAFT LETTERS TO OP (x3). DRAFT DECLARATION OF MAILING. PREPARE DOCUMENTS (x10) FILED WITH THE COURT FOR SERVICE BY MAIL TO OP (x3).	1	\$ 150.00	\$ 150.00	CJ
3/28/2022	REVIEW FILE. UPDATE ACTION LIST. [N.C.]	0.1	\$ -	\$ -	DH
3/28/2022	T.C. WITH CTJ.	0.1	\$ 350.00	\$ 35.00	DH
3/28/2022	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
3/23/2022	DRAFT MOTION FOR ALTERNATIVE SERVICE AND DECLARATION OF PLAINTIFF.	2.3	\$ 350.00	\$ 805.00	DH
3/23/2022	DRAFT DECLARATION OF COUNSEL AND PROPOSED ORDER. T.C. WITH CTJ.	0.4	\$ 350.00	\$ 140.00	DH
3/23/2022	DRAFT PRIMARY WITNESS LIST DISCLOSURE.	0.4	\$ 350.00	\$ 140.00	DH
3/23/2022	RECEIVE AND REVIEW EMAILS FROM COURT AND CTJ. [N.C.]	0.1	\$ -	\$ -	DH

	EDIT MOTION AND DECLARATIONS (x2)					
	FOR MOTION TO SERVE BY MAIL.					
	CONDUCT SEARCH ON OPPOSING PARTY.					
	ADD RESULTS TO DECLARATION OF DATH.					
	REVIEW COURT MATTERS ALLOWED FOR					
	EX PARTE VIA THE CLERK. EFILE					
	DOCUMENTS (x5) AND SUBMIT FOR EX					
	PARTE PRESENTATION. DOWNLOAD					
3/23/2022	CONFIRMATIONS OF FILING.	2.2	\$	150.00	\$	330.00 CJ
3/4/2022	T.C. WITH MICK O'DELL.	0.2	\$	350.00	\$	70.00 DH
	RECEIVE AND REVIEW EMAIL FROM CTJ.					
2/14/2022	[N.C.]	0.1	\$	-	\$	- DH
1/20/2022	REVISE IFCA LETTER.	0.5	\$	350.00	\$	175.00 DH
1/17/2022	SEND EMAIL TO EXPERT WITNESS.	0.2	\$	150.00	\$	30.00 CJ
	RECEIVE AND REVIEW EMAIL FROM					
1/11/2022	CLIENT. T.C. WITH CTJ.	0.1	\$	350.00	\$	35.00 DH
	RECEIVE AND REPLY TO THREE EMAILS					
1/10/2022	FROM CLIENT.	0.1	\$	350.00	\$	35.00 DH
	RECEIVE AND REPLY TO EMAIL FROM					
1/6/2022	CLIENT. [N.C.]	0.1	\$	-	\$	- DH
1/6/2022	T.C. WITH CLIENT.	0.2	\$	350.00	\$	70.00 DH
	RECEIVE AND REPLY TO EMAIL FROM					
1/6/2022	CLIENT. [N.C.]	0.1	\$	-	\$	- DH
	RECEIVE AND REPLY TO EMAIL FROM					
1/5/2022	CLIENT. [N.C.]	0.1	\$	-	\$	- DH
	REVIEW FILE. SCAN EXPERT REPORT.					
1/4/2022	EMAIL CLIENT.	0.1	\$	350.00	\$	35.00 DH
	RECEIVE AND REPLY TO EMAIL FROM					
12/22/2021	CLIENT.	0.1	\$	350.00	\$	35.00 DH
	READ EMAILS FROM CLIENT AND DATH.					
12/22/2021	[N.C.]	0.1	\$	-	\$	- CJ
12/22/2021	T.C. WITH EXPERT. [N.C.]	0.1	\$	-	\$	- CJ
	SEND AND RECEIVE TEXTS FROM DATH.					
12/22/2021	[N.C.]	0.1	\$	-	\$	- CJ
12/21/2021	REVIEW FILE.	0.1	\$	350.00	\$	35.00 DH
12/21/2021	MEET WITH EXPERT.	0.3	\$	350.00	\$	105.00 DH
12/21/2021	T.C. WITH EXPERT. EMAIL CLIENT.	0.2	\$	350.00	\$	70.00 DH
	RECEIVE AND REPLY TO EMAIL FROM					
12/21/2021	CLIENT. [N.C.]	0.1	\$	-	\$	- DH
	RECEIVE AND REVIEW EMAIL FROM					
12/21/2021	CLIENT. [N.C.]	0.1	\$	-	\$	- DH
12/20/2021	T.C. WITH EXPERT WITNESS.	0.2	\$	350.00	\$	70.00 DH
	RECEIVE AND REPLY TO EMAIL FROM					
11/5/2021	CLIENT.	0.1	\$	350.00	\$	35.00 DH
10/22/2021	T.C. WITH APPRAISER. [N.C.]	0.1	\$	-	\$	- CJ

10/22/2021	REDACT FINANCIAL STATEMENTS. EMAIL TO DATH.	0.3	\$	150.00	\$	45.00	CJ
10/22/2021	RECEIVE AND RESPOND TO TEXT FROM CLIENT.	0.1	\$	150.00	\$	15.00	CJ
10/21/2021	CALL TO APPRAISER. [N.C.]	0.1	\$	-	\$	-	CJ
10/13/2021	RECEIVE AND REVIEW EMAILS FROM CLIENT AND CTJ. [N.C.]	0.2	\$	-	\$	-	DH
10/11/2021	T.C. WITH CTJ.	0.1	\$	350.00	\$	35.00	DH
10/5/2021	T.C. WITH APPRAISER. [N.C.]	0.1	\$	-	\$	-	CJ
10/5/2021	SECOND T.C. WITH APPRAISER. SEND EMAIL TO APPRAISER. [N.C.]	0.1	\$	-	\$	-	CJ
10/4/2021	EDIT INVENTORY. REVIEW SECRETARY OF SITE WEBSITE FOR INFORMATION ON STORAGE FACILITIES. EMAIL INVENTORY TO APPRAISER.	1	\$	150.00	\$	150.00	CJ
10/4/2021	SEND EMAIL TO CLIENT.	0.1	\$	150.00	\$	15.00	CJ
10/1/2021	READ AND RESPOND TO TEXTS FROM CLIENT. [N.C.]	0.1	\$	-	\$	-	CJ
9/30/2021	PREPARE FOR CLIENT MEETING. [N.C.]	0.1	\$	-	\$	-	CJ
9/30/2021	T.C. WITH CLIENT.	2.4	\$	150.00	\$	360.00	CJ
9/30/2021	RECEIVE VOICEMAIL FROM APPRAISER. RECEIVE TEXT FROM CLIENT. [N.C.]	0.1	\$	-	\$	-	CJ
9/29/2021	READ AND RESPOND TO EMAIL FROM CLIENT. [N.C.]	0.1	\$	-	\$	-	CJ
9/28/2021	RECEIVE AND REVIEW EMAILS FROM CTJ AND STATE FARM. [N.C.]	0.1	\$	-	\$	-	DH
9/23/2021	RECEIVE AND RESPOND TO EMAIL FROM APPRAISER. SEND TEXT TO CLIENT. TRACK PMT TO STATE FARM. DOWNLOAD CONFIRMATION OF DELIVERY.	0.2	\$	150.00	\$	30.00	CJ
9/21/2021	T.C. WITH CTJ. REVIEW FILE.	0.1	\$	350.00	\$	35.00	DH
9/21/2021	T.C. WITH APPRAISER.	0.1	\$	150.00	\$	15.00	CJ
9/20/2021	READ EMAILS FROM CLIENT (x2). UPDATE CLIENT EFILE. [N.C.]	0.2	\$	-	\$	-	CJ
9/20/2021	SEARCH FOR VALUATION EXPERT CONTACT INFORMATION. T.C. WITH VALUATION EXPERT. SEND AND RECEIVE TEXTS FROM CLIENT. SEND EMAIL TO VALUATOR.	0.8	\$	150.00	\$	120.00	CJ
9/17/2021	RECEIVE AND REVIEW EMAILS FROM CLIENT. REVIEW FILE. EMAIL CLIENT. T.C. WITH CLIENT. EMAIL CLIENT.	0.5	\$	350.00	\$	175.00	DH
9/8/2021	T.C. WITH CTJ.	0.1	\$	350.00	\$	35.00	DH
9/8/2021	RECEIVE AND RESPOND TO EMAIL FROM PREMIUM PROCESS. [N.C.]	0.1	\$	-	\$	-	CJ

	READ AND RESPOND TO SECOND EMAIL				
9/8/2021	FROM PREMIUM PROCESS. [N.C.]	0.1	\$ -	\$ -	CJ
9/7/2021	MEET WITH CTJ.	0.1	\$ 350.00	\$ 35.00	DH
9/7/2021	MEET WITH CTJ. [N.C.]	0.1	\$ -	\$ -	CJ
9/7/2021	SECOND MEETING WITH CTJ.	0.1	\$ 350.00	\$ 35.00	DH
9/7/2021	SECOND MEETING WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
9/3/2021	T.C. WITH CLIENT.	0.6	\$ 350.00	\$ 210.00	DH
	READ AND RESPOND TO EMAIL FROM				
9/3/2021	CLIENT. [N.C.]	0.1	\$ -	\$ -	CJ
	DRAFT CHECK FOR PREMIUM PROCESS.				
9/3/2021	PREPARE FOR MAILING.	0.1	\$ 150.00	\$ 15.00	CJ
8/18/2021	T.C. WITH CTJ. [N.C.]	0.1	\$ -	\$ -	DH
8/18/2021	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
8/17/2021	T.C. WITH CTJ.	0.1	\$ 350.00	\$ 35.00	DH
8/17/2021	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
	RECEIVE AND REVIEW EMAIL FROM				
8/12/2021	COURT.	0.1	\$ 350.00	\$ 35.00	DH
	RECEIVE AND REPLY TO EMAILS FROM				
	CLIENT. ATTEMPT TO CALL DEFENDANT.				
	REVIEW AND REVISE SUMMONS AND				
7/30/2021	COMPLAINT. EMAIL CTJ.	0.4	\$ 350.00	\$ 140.00	DH
	RECEIVE EMAIL FROM DATH. EDIT				
7/30/2021	DOCUMETS (x2). EMAIL TO DATH.	0.3	\$ 150.00	\$ 45.00	CJ
	T.C. WITH DATH. EDIT DOCUMENTS.				
7/30/2021	EMAIL TO DATH. [N.C.]	0.1	\$ -	\$ -	CJ
	RECEIVE AND REPLY TO EMAILS FROM				
7/29/2021	CLIENT.	0.1	\$ 350.00	\$ 35.00	DH
	RECEIVE AND REPLY TO EMAIL FROM				
7/21/2021	CLIENT. [N.C.]	0.1	\$ -	\$ -	DH
7/14/2021	T.C. WITH CTJ.	0.1	\$ 350.00	\$ 35.00	DH
7/14/2021	T.C. WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
	RECEIVE AND REVIEW EMAILS FROM				
5/13/2021	KENT POLICE AND CLIENT.	0.1	\$ 350.00	\$ 35.00	DH
	Filed police report with Kent Police -				
5/12/2021	tracking number: T21001572	0.7	\$ 250.00	\$ 175.00	AFH
	RECEIVE AND REPLY TO EMAIL FROM				
5/10/2021	CLIENT.	0.1	\$ 350.00	\$ 35.00	DH
	RECEIVE AND REVIEW EMAILS FROM				
5/10/2021	CLIENT. [N.C.]	0.1	\$ -	\$ -	DH
2/3/2021	MEET WITH CTJ. [N.C.]	0.1	\$ -	\$ -	DH
2/3/2021	MEET WITH DATH. [N.C.]	0.1	\$ -	\$ -	CJ
	READ AND RESPOND TO TEXTS FROM				
1/28/2021	CLIENT. [N.C.]	0.1	\$ -	\$ -	CJ
1/28/2021	T.C. WITH CLIENT.	0.5	\$ 150.00	\$ 75.00	CJ

11/13/2020	REVIEW DRAFT SUMMONS AND COMPLAINT. EMAIL TO CLIENT. RECEIVE AND REVIEW EMAIL FROM CTJ.	0.2	\$	350.00	\$	70.00	DH
11/11/2020	[N.C.]	0.1	\$	-	\$	-	DH
11/10/2020	MEET WITH CTJ.	0.1	\$	350.00	\$	35.00	DH
11/10/2020	MEET WITH DATH. [N.C.]	0.1	\$	-	\$	-	CJ
11/10/2020	RECEIVE AND REPLY TO EMAIL FROM CLIENT.	0.1	\$	350.00	\$	35.00	DH
11/9/2020	MEET WITH CTJ. RECEIVE AND REVIEW EMAILS FROM CTJ.	0.1	\$	350.00	\$	35.00	DH
11/9/2020	EMAIL TO CLIENT.	0.1	\$	350.00	\$	35.00	DH
11/6/2020	REVIEW SUMMONS AND COMPLAINT. RUN PEOPLE REPORT ON OP AND SEARCH COUNTY RECORDER'S SITE FOR OWNERSHIP INFORMATION.	1	\$	150.00	\$	150.00	CJ
10/12/2020	T.C. WITH CTJ.	0.1	\$	350.00	\$	35.00	DH
10/12/2020	T.C. WITH DATH. [N.C.]	0.1	\$	-	\$	-	CJ
10/12/2020	READ AND RESPOND TO EMAILS FROM AH. [N.C.]	0.1	\$	-	\$	-	CJ
10/12/2020	CALL TO CLIENT. [N.C.]	0.1	\$	-	\$	-	CJ
10/12/2020	RECEIVE AND RESPOND TO MESSAGES FROM AH. [N.C.]	0.1	\$	-	\$	-	CJ
10/9/2020	RECEIVE AND REVIEW EMAIL FROM CTJ.	0.1	\$	350.00	\$	35.00	DH
10/8/2020	RECEIVE AND REVIEW DOCUMENTS FROM AH. SEND RESPONSE. [N.C.]	0.3	\$	-	\$	-	CJ
10/8/2020	RECEIVE AND RESPOND TO TEXTS FROM CLIENT. T.C. WITH CLIENT. DRAFT NOTES TO FILE. EMAIL TO DATH AND AH.	0.4	\$	150.00	\$	60.00	CJ
10/8/2020	T.C. WITH CTJ. RECEIVE AND REPLY TO EMAIL AH.	0.2	\$	350.00	\$	70.00	DH
10/7/2020	T.C. WITH AH AND CTJ.	0.1	\$	350.00	\$	35.00	DH
9/17/2020	REVIEW VM FROM CLIENT. SEND TEXT. [N.C.]	0.1	\$	-	\$	-	CJ
9/11/2020	T.C. WITH CLIENT. [N.C.]	0.1	\$	-	\$	-	CJ
8/31/2020	REVIEW VM FROM CLIENT. CALL TO CLIENT. SEND EMAIL TO CLIENT. [N.C.]	0.1	\$	-	\$	-	CJ
8/31/2020	T.C. WITH CLIENT.	0.2	\$	150.00	\$	30.00	CJ
8/3/2020	CALL TO CLIENT. SEND EMAIL TO CLIENT. SET UP FILE. [N.C.]	0.2	\$	-	\$	-	CJ
8/3/2020	DRAFT LEGAL SERVICES AGREEMENT. EMAIL TO CLIENT. [N.C.]	0.2	\$	-	\$	-	CJ
		51.80	\$10,215.00 USD				

Case Number:	21-2-10669-9
Date:	September 24, 2024
Serial ID:	24-545796-6524210C7J
Certified By:	Catherine Cornwall King County Clerk, Washington

I, CATHERINE CORNWALL, Clerk of the Superior Court of the State of Washington for King County, do hereby certify that this copy is a true and perfect transcript of said original as it appears on file and of record in my office and of the whole thereof. IN TESTIMONY WHEREOF, I have affixed this Seal of said Superior Court at my office at Seattle.



Catherine Cornwall, King County Clerk



Instructions to recipient: If you wish to verify the authenticity of the certified document that was transmitted by the Clerk, you must create and/or sign-in to your KC Script Portal account. Only e-certified documents that were directly ordered through the KC Script Portal can be verified through this tool.

Sign in to KC Script Portal:

<https://dja-prd-ecexap1.kingcounty.gov/>

After you login to your account, click Certified Copy Verification from the black ribbon menu at the top of the screen. There you will enter the following Serial ID.

Serial ID: **24-545796-6524210C7J**

This document contains 8 page plus this sheet, and is a true and correct copy of the original that is of record in the King County Clerk's Office. The copy associated with Serial ID will be displayed by the Clerk.

EXHIBIT D

ROBERT J. WORTH, ESQ.
INSURANCE EXPERT WITNESS
23801 Calabasas Road, Suite 2033
Calabasas, CA 91302
(818) 222-2433; (818) 222-2139 (FAX)
Email: robert@robertworthlaw.com

August 13, 2024

Client(s): Dubs Herschlip & Rafael Bultz
Dunlap Bennett & Ludwig
627 5th St., Suite 203
Mukilteo, WA, 98275 *via e-mail only:* dubs@dbllawyers.com; rbultz@dbllawyers.com

United States District Court – Western District of Washington at Seattle
Case No.: 2:23-cv-00232-EKE
Billing Statement #1: Debra O’Neal v. State Farm Fire Insurance Co.

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
12-12-23	Zoom meeting with (MTGW) attorney Dubs Herschlip, Esq. @ Dunlop Bennett & Ludwig his client’s rental policy & theft of personal belongings on 3-20-2020; \$90k judgment against def. storage company; no of \$ by policyholder’s carrier; voicemails by both storage facilities; items transferred from 1 st facility to Friends & family			N/C			
12-12-23	Receipt and review (RAR) email from office manager William Adan asking for EXW retainer; 5:09 pm			N/C			
12-13-23	Replied to Mr. Adan’s Email that I was not Being engaged as a legal expert but an insurance expert; encl. insurance expert witness retainer & CV			N/C			
12-13-23	EXW Executed Expert						

Page 2. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
12-13-23	Cont'd. Witness Retainer Agreement (AG) executed			N/C			
12-15-23	RAR Mr. Adan's Email confirming \$5,000.00 transfer Initiated; 3:24 pm			N/C			
12-15-23	CNF Mr. Adan's email Re transfer initiated; 5:19 pm			N/C			
12-18-23	Initial 10 hour \$ payment Advanced and \$500.00 EXW designation fee sent by electronic check paid			\$5,000.00	(\$4,500.00 +\$500.00)		
12-18-23	Receipt and review (RAR) email from Attorney Rafael Bultz Re: summary of Documents to be Shared for review (REV)	.1	@\$450.00/hr.	\$ 45.00			
12-19-23	RAR email from Mr. Adan & B of A wire Transfer CNF DOC			N/C			
12-22-23	Expert Witness (EXW) signed Retainer Agreement (AG) 12-14-23			N/C			
1-4-24	TF/TCW Mr. Bultz rescheduling (SCH) phone call	.1	@\$450.00/hr.	\$ 45.00			
1-4-24	Cont'd., RAR Mr. Adan email Re: scheduling (SCH) phone conference with (TCW) counsel CSL; 9:38 am	.1	@\$450.00/hr.	\$ 45.00			
1-4-24	Email from CSL Mr. Bultz requesting (RQ) REV 7 pages, Special Rog & RFPOD for def State Farm to produce Based on my RQ for						

Page 3. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
1-4-24	Cont'd. St Farm claims manual + bulletins for REV; 12:28 pm	.2	@\$450.00/hr.	\$ 90.00			
1-4-24	TF/TCW Mr. Adan rescheduling (SCH) phone call; CNF receipt of Mr. Bultz's 12-18-23, 11:18 am email with DOCs summary provided; 3:11 pm	.4	@\$450.00/hr.	\$ 180.00			
1-4-24	RAR email from Mr. Adan CNF earlier phone DCN; 4:11 pm	.1	@\$450.00/hr.	\$ 45.00			
1-4-24	RAR email from Mr. Adan CNF earlier phone DCN; 5:03 pm	.1	@\$675.00/hr.	\$ 67.50			
1-4-24	Email to CSL and Mr. Adan CNF my Electronic signature DECL in support Mo To Extend Discovery; 5:08 pm	.1	@\$675.00/hr.	\$ 67.50			
1-8-24	RAR mis-directed emails from Mr. Adan			N/C			
1-8-24	Email to Mr. Adan Re mis-directed emails			N/C			
1-9-24	Conference with CSL Re declaration (DECL) for add'l. time due to commitments	.3	@\$450.00/hr.	\$ 135.00			
1-9-24	Rev draft (DR) of for add'l. time for Rule 26 DECL preparation (PREP)	.1	@\$450.00/hr.	\$ 45.00			
1-10-24	RAR draft (DR) of for add'l. time for Rule 26 DECL (PREP); 2:38 pm	.1	@\$450.00/hr.	\$ 45.00			
1-11-24	RAR Mr. Bultz email RQ Texas federal CS info.; 11:00 am	.1	@\$450.00/hr.	\$ 45.00			

Page 4. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
1-11-24	Emailed draft (DR for add'l. time for Rule 26 DECL (PREP) revisions; contacted Texas CSL; approved info.; 3:43 pm	.1	@\$450.00/hr.	\$ 45.00			
1-11-24	RAR email from Mr. Bultz confirming Mutual approval of Info disclosure to Texas CSL; rev DR for add'l. time for Rule 26 DECL (PREP) revisions; 4:39 pm	.1	@\$450.00/hr.	\$ 45.00			
1-11-24	Email to Mr. Bultz confirming I signed DECL in support of MO for add'l. time for Rule 26 DECL (PREP); 5:08 pm	.1	@\$675.00/hr.	\$ 67.50			
1-12-24	Email to Mr. Bultz; will contact other CSL on federal case; 12:54 pm	.1	@\$450.00/hr.	\$ 45.00			
1-19-24	Email to Mr. Bultz with revision of DECL for REV; other federal cs info.; 4:55 pm	.1	@\$450.00/hr.	\$ 45.00			
2-2-24	RAR email from CSL Rafael Bultz Re Attached 16 page O'Neal Stipulation (STIP) with Order Proposed by St Farm; REV of Stip; 10:41 am	.4	@\$450.00/hr.	\$ 180.00			
2-2-24	Telephone call to (TT) Mr. Bultz and left message for CSL Re proposed STIP At 4:22 pm	.1	@\$450.00/hr.	\$ 45.00			
2-5-24	TT/TCW CSL Bultz Re need One Drive						

Page 5. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
2-5-24	Cont'd. document link; status on protective order by State Farm and document (DOC) REV may require after hours billing work time; 4:55- 5:03 pm;	.2	@\$450.00/hr.	\$ 90.00			
2-6-24	RAR 9:49 am Mr. Bultz email Re DOCs link and IFCA Statutes;	.1	@\$450.00/hr.	\$ 45.00			
2-6-24	RAR 9:59 am Mr. Herschlip email; Re client's limited \$; time use in DOC REV and DECL	.1	@\$450.00/hr.	\$ 45.00			
2-6-24	Emailed CSL; confirm RAR of theirs; waiting for link						
2-6-24	RAR 11:53 am Mr. Bultz email Re order of DOCs REV	.1	@\$450.00/hr.	\$ 45.00			
2-6-24	RAR 2-6-24, 12:28 pm Mr. Bultz email Re One Drive DOCs link	.1	@\$450.00/hr.	\$ 45.00			
2-6-24	Sent email to Mr. Bultz Re no link was received	.1	@\$450.00/hr.	\$ 45.00			
2-6-24	Sent email to Mr. Bultz Re no link was received	.1	@\$450.00/hr.	\$ 45.00			
2-6-24	RAR follow up email from Mr. Bultz on link	.1	@\$450.00/hr.	\$ 45.00			
2-6-24	RAR email from Mr. Herschlip Re his client's (CL's) limited budget at 9:59 am	.1	@\$450.00/hr.	\$ 45.00			
2-6-24	Emailed both CSL at 10:25 am CNF their emails and waiting						

Page 6. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
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2-6-24	Cont'd. One Drive link	.1	@\$450.00/hr.	\$	Courtesy N/C		
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2-6-24 RAR email from Mr.

Bultz at 10:33 am

that One Drive

shoud have

arrived at 9:43 am

.1	@\$450.00/hr.	\$	Courtesy N/C
----	---------------	----	--------------

2-6-24 TT/TCW CSL Bultz

at 11:00 am on

One Drive

.2	@\$450.00/hr.	\$	90.00
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2-6-24 Emailed reply to Mr.

Bultz CNF receipt

of emails this am then

able to access DOCs

from link

.1	@\$450.00/hr.	\$	Courtesy N/C
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2-6-24 RAR email at 11:00

am Re my access

of email link

.1	@\$450.00/hr.	\$	Courtesy N/C
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2-6-24 TT/TCW Mr. Bultz

at 11:00 am for 12

mins. Re DOCs

accessed and a

discussion (DCN) on

REV order, starting

With his client's

Deposition (DEPO)

REV & of exhibits

(EXB)

.2	@\$450.00/hr.	\$	90.00
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2-6-24 RAR email from

CSL Mr. Bultz on

DOC REV order/

summary of items

included; 11:52 am

.1	@\$450.00/hr.	\$	45.00
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2-6-24 Emailed Mr. Bultz

confirming receipt

of subfolder; 12:28 pm

.1	@\$450.00/hr.	\$	Courtesy N/C
----	---------------	----	--------------

2-6-24 Initiate REV of

DEPO transcript

Debra O'Neal at

11:39 am-11:54 (on

12-21-2023 by

Defense (DEF)

CSL Jim Hicks

For State Farm)

.1	@\$450.00/hr.	\$	45.00
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2-6-24 RAR email from Mr.

Page 7. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
2-6-24	Cont'd. Bultz on DOC REV priority order; and 1 page Unfair Claims Practices "RCW"; 11:55 am	.1	@\$450.00/hr.	\$ 45.00			
2-6-24	RAR 12:28 email from Mr. Bultz on depo exhibits subfolder;	.1	@\$450.00/hr.	\$ 45.00			
2-6-24	Cont'd. REV of the DEPO transcript at 1:00 pm - 2:30 pm with page-line notes taken	1.5	@\$450.00/hr.	\$ 675.00			
2-7-24	Cont'd. REV DEPO from 10:06 am- 11:35 am	1.5	@\$450.00/hr.	\$ 675.00			
2-7-24	REV DEPO EXB at 11:36 am of two MP3 recorded phone messages dated 5-12-20	.1	@\$450.00/hr.	\$ 45.00			
2-7-24	Cont'd REV of DEPO at 1:15 pm- 3:20 pm	2.1	@\$450.00/hr.	\$ 945.00			
2-7-24	Cont'd REV of DEPO at 3:28 pm- 4:30 pm	.8	@\$450.00/hr.	\$ 360.00*			(-.2) courtesy adjustment from 1.0*
2-8-24	Cont'd REV of DEPO at 9:12 am -10:40 am	1.5	@\$450.00/hr.	\$ 675.00			
2-8-24	Cont'd. REV of DEPO at 10:45 am- 2:00 pm (completed)	3.3	@\$450.00/hr.	\$1,485.00			
2-8-24	REV Ms. O'Neal's State Farm Renter's Policy with notes taken at 3:00 pm- 4:15 pm, end	1.2	@\$450.00/hr.	\$ 540.00			
2-8-24	Initiate REV of State Farm Claims File at 4:20 pm- 4:39 pm	.2	@\$450.00/hr.	\$ 90.00			

Page 8. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
2-9-24	Cont'd REV of State Farm Claims File at 9:05 am- 11:12 am on Ms. O'Neal	2.1	@\$450.00/hr.	\$ 945.00			
2-9-24	Cont'd. REV of State Farm O'Neal Claim File at 11:24 am- 12:14 pm	.8	@\$450.00/hr.	\$ 360.00			
2-9-24	Cont'd. O'Neal Claim File REV 1:00 pm- 1:20 pm	.3	@\$450.00/hr.	\$ 135.00			
2-9-24	Cont'd. O'Neal Claim File REV 1:30 pm- 3:43 pm	2.2	@\$450.00/hr.	\$ 990.00			
2-9-24	Cont'd. O'Neal Claim File REV 3:50 pm- 4:20 pm	.5	@\$450.00/hr.	\$ 225.00			
2-12-24	Cont'd. O'Neal Claim File REV 9:00 am- 9:45 am	.7	@\$450.00/hr.	\$ 315.00			
2-12-24	Cont'd. O'Neal Claim File REV 10:00 am- 11:14 am	1.2	@\$450.00/hr.	\$ 540.00			
2-12-24	Cont'd. O'Neal Claim File REV 11:30 am- 1:36 pm	2.1	@\$450.00/hr.	\$ 945.00			
2-12-24	Cont'd. O'Neal Claim File REV 2:55 pm- 3:57 pm	1.0	@\$450.00/hr.	\$ 450.00			
2-12-24	Cont'd. O'Neal Claim File REV 4:15 pm- 5:00 pm	.7	@\$450.00/hr.	\$ 315.00			
2-13-24	Begin REV of State Farm Rule 26 Civil Procedure Initial Disclosure Statement; Revised Code Washington (RCW); Washington Admin. Code, 9:00 am- 9:43 am;	.7	@\$450.00/hr.	\$ 315.00			

Page 9. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
2-13-24	Cont'd.REV of WACs, 10:30 am- 12:15 pm; end	1.7	@\$450.00/hr.	\$ 765.00			
2-13-24	Begin REV of State Farm FRCP 7.1 Corp. Disclosure and Diversity Statement, 1:00 pm-1:36 pm; end	.6	@\$450.00/hr.	\$ 270.00			
2-13-24	REV DOCs, Notice (NT) of Plaintiff CSL; Defendant CSL Certificate of State Records, 2:30 pm- 3:00 pm	.5	@\$450.00/hr.	\$ 225.00			
2-13-24	Cont'd. REV DOCs, Standing Orders, 3:10 pm-4:05 pm	.9	@\$450.00/hr.	\$ 405.00			
2-13-24	Cont'd. REV DOCs, Defendant State Farm's MOSJ; Note On MO Calendar; 4:16 pm-4:42 pm	.5	@\$450.00/hr.	\$ 225.00			
2-14-24	Cont'd. REV DOCs, Proposed Order on State Farm's MOSJ; Declaration (DECL) of Christopher Furman; Notice (NT) of filing paper of physical materials with clerk; (STIP) and Order Re continuances of Def. State Farm MOSJ; STIP and Order Re State Farm's MOSJ Continuances; DECL of Plaintiff CSL Dubs Herschlip; 9:10 am-9:52 am	.7	@\$450.00/hr.	\$ 315.00			
2-14-24	Cont'd. REV DOCs, DEF State Farm's Partial MOSJ with EXBs; 10:05 am- 10:25 am	.4	@\$450.00/hr.	\$ 180.00			
2-14-24	Cont'd. REV DOCs,						

Page 10. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
2-14-24	Cont'd Debra O'Neal's 12-21-23 Errata of And signature for her DEPO; 10:25 am- 10:31 am	.1	@\$450.00/hr.	\$ 45.00			
2-14-24	REV Standing Order For All Civil Cases; REV CT Docket for Friends & Family case; Proposed Order; Order Of Default Against Defs Friends & Family Moving & Storage, And John Muse (Corp. President); O'Neal Order on MO For Default Judgment Signed; REV of Plaintiff O'Neal's Complaint For Damages against Defs Friends & Family Moving & Storage, & John Muse; REV Complaint Summons; Plaintiff's DECL in Support To Serve DEFs by Mail; 10:31 am-11:52 am	.4	@\$450.00/hr.	\$ 180.00			
2-14-24	Cont'd. REV DOCs, DECL of Due Diligence of Process Server; MO To Serve						
2-14-24	Cont'd. and other DOCs (See Notes on P. 35); 12:30 pm- 1:30 pm	1.0	@\$450.00/hr.	\$ 450.00			
2-14-24	Begin REV of discovery/multiple emails (See P. 36 of Notes); 2:00 pm- 3:30 pm	1.5	@\$450.00/hr.	\$ 675.00			
2-14-24	Cont'd. REV of DOCs as noted (See Notes P. 37); 3:40 pm-4:24 pm	.9	@\$450.00/hr.	\$ 405.00			
2-15-24	Cont'd, REV of disclosures as noted						

Page 11. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
2-15-24	Cont'd. (See Notes P. 37); 9:00 am- 9:15 am; end	.2	@\$450.00/hr.	\$ 90.00			
2-15-24	DOCs; (See Notes, P.37 at Bottom); 9:15 am-10:20 am	1.1	@\$450.00/hr.	\$ 495.00			
2-15-24	Cont'd. REV of DOCs, (Schnitzer); (See Notes, P.38 at Top); 10:30 am- 11:00 am; end	.5	@\$450.00/hr.	\$ 225.00			
2-15-24	Begin REV of State Farm Operations Guide (See Notes, P.38 middle); P. 22 of 280 Re probability of theft and the need to conduct an investigation (IV), P. 24 of 280 (See Notes P. 39); 11:08- 2:40 pm; end	3.5	@\$450.00/hr.	\$1,575.00			
2-20-24	Begin REV of State Farm Fire and Casualty Ins. 2019 Annual Statement of Assets, Liabilities, Surplus And Other Funds; 2020 Statement of Assets, Income And also 2021 Annual Statement	.2	@\$450.00/hr.	\$ 90.00			
2-22-24	Call from (TF) CSL Mr. Bultz for a discussion, (DCN); 11:52 am-12:02 pm	.2	@\$450.00/hr.	\$ 90.00			
2-22-24	RAR 2-22-24, 12:20 pm Mr. Bultz email Re O'Neal standing Orders, and her DEPO errata sheet	.1	@\$450.00/hr.	\$ 45.00			
2-23-24	TF CSL Mr. Bultz for discussion Re						

Page 12. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
	discovery, 11:27 am- 11:40 am	.2	@\$450.00/hr.	\$ 90.00			
3-1-24	Begin preparation (PREP) of Rule 26 Declaration; 1:15 pm- 1:45 pm	.5	@\$450.00/hr.	\$ 225.00			
3-4-24	TT/TCW CSL Mr. Bultz RE Status (STA) on DOCs & PREP of Rule 26 DECL; scheduling (SCH) TCW with CSL Mr. Herschlip; 2:23 pm- 2:48 pm	.5	@\$450.00/hr.	\$ 225.00			
3-4-24	Cont'd. PREP of Rule 26 DECL; 3:00 pm-5:00 pm	2.0	@\$450.00/hr.	\$ 900.00			
3-5-24	I CNF online AG at 8:39 am for confi- dential Atty Communication TF CSLs' office	.1	@\$450.00/hr.	\$ 45.00			
3-5-24	RAR Mr. Adan email Re cancellation of SCH phone MTG until next week	.1	@\$450.00/hr.	\$ 45.00			
3-5-24	RAR Mr. Herschlip 8:46 am email CNF cancellation of SCH phone MTG at a later date, T.B.D.; he's trying to get def DOCs produced	.1	@\$450.00/hr.	\$	Courtesy N/C		
3-5-24	Emailed 9:21 am to CSL Mr. Herschlip AG to re-SCH TCW	.1	@\$450.00/hr.	\$ 45.00			
3-5-24	RAR Mr. Herschlip's CNF 3-5-24, 10:36 am email to get more of State Farm OG DOCs	.1	@\$450.00/hr.	\$ 45.00			
3-5-24	RAR office mgr. email O'Neal CSL's error; 11:01 am	.1	@\$450.00/hr.	\$	Courtesy N/C		

Page 13. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
3-5-24	Emailed office mgr. At 11:45 am Re his email typo of 3-4 -24 phone mtg	.1	@\$450.00/hr.	\$	Courtesy N/C		
3-5-24	RAR office mgr. 12:22 pm Re his Typo email and his RQ to disregard it;	.1	@\$450.00/hr.	\$	Courtesy N/C		
3-5-24	Cont'd. REV of DOCs and PREP of Rule 26 DECL; 10:35 am-12:55 pm	2.3	@\$450.00/hr.	\$1,575.00			
3-6-24	TT Kent, WA P.D. And provided the direct # of police commander; 4:17 pm;	.1	@\$450.00/hr.	\$ 45.00			
3-6-24	TT Kent, WA P.D. Commander Phil; Johnson; 4:19 pm;	.1	@\$450.00/hr.	\$ 45.00			
3-6-24	TT/TCW Kent, PD Commander Johnson and DCN on the meanings of PR box abbreviations; his opinion on O'Neal loss facts and his conclusion of theft per WA RCW and no call from any Def claims hander; 4:21 pm-4:29 pm;	.2	@\$450.00/hr.	\$ 90.00			
3-6-24	TT/TCW Mr. Bultz Re suppl PR box codes on PR; 4:30 pm- 4:53 pm	.4	@\$450.00/hr.	\$ 180.00			
3-11-24	RAR email from CSL Mr. Bultz with DOCS attached produced by State Farm; 9:53 am	.1	@\$450.00/hr.	\$ 45.00			
3-11-24	Emailed CSL Mr. Bultz 10:39 am CNF receipt of DOCs link; (RQ)						

Page 14. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
3-11-24	Cont'd. CNF 3-12-24 DECL deadline tomorrow is off calendar (CAL) to allow for DOC REV and analysis (ANAL);	.1	@\$450.00/hr.	\$ 45.00			
3-11-24	RAR email from CSL Mr. Bultz CNF deadline is now off CAL; 11:14 am	.1	@\$450.00/hr.	\$ 45.00			
3-12-24	TF/TCW CSL Re adjusted Deadline on Rule 26 DECL; 4:41 pm-5:02	.4	@\$450.00/hr.	\$ 180.00			
3-13-24	RAR additional of State Farm's DOC production received in 3-11-24 email of 212 pages; 10:15 am	.1	@\$450.00/hr.	\$ 45.00			
3-13-24	REV RCW 9A.56.010 Re theft definition; 10:22 am	.1	@\$450.00/hr.	\$ 45.00			
3-13-24	REV State Farm Agent's Agreement (AG) Re Forrest Dawson Ins. Agent effective 8-1 -21; 10:30 am	.4	@\$450.00/hr.	\$ 45.00			
3-13-24	TT Commander Johnson & left Message to call (LMTC) Re Supp Rpt clarification; 2:36 pm	.1	@\$450.00/hr.	\$ 45.00			
3-13-24	TF/TCW Kent PD Commander Phil Johnson on cell Re Suppl online Rpt #3 21-51161 by victim (VIC) Ms. O'Neal; Some points: Dept. RMS (Records Management System) per						

Page 15. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
3-13-24	Cont'd. Commander Phil Johnson Re Suppl online Rpt #3 21-51161 by victim (VIC) Ms. O'Neal; Some points: Dept. RMS (Records Management System); electronic data is entered online to computer automatic disputes (CAD) #; It's assigned for online reporting; "Closed/ Leads Exhausted"; Crime/Incident Box w/ "Property Found/ Lost, etc" other Scenarios; thus, police didn't prepare this suppl. report; info was inserted online, not by phone call; if "VIC" provided more info Re property being in care, custody and control of storage facility then decided to end business, and failed to contact Ms. O'Neal, then, per Commander Johnson She was the victim of a theft "absolutely" per RCW 9A.56.020; Commander also CNF He did not receive a phone call or online claims person Re this police report; 3:55 pm	1.3	@\$450.00/hr.	\$ 450.00			
3-13-24	TT/TCW Mr. Bultz & brought him in on 3-way DCN w/CSL and Kent PD Commander Johnson; 4:52 pm	.2	@\$450.00/hr.	\$ 90.00		(After hours rate waived.)	
3-13-24	After DCN with Commander ended, DCN						

Page 16. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
3-13-24	Cont'd. With CSL held Re CT's ruling on the MOSJ; 5:04 pm (after hours)	.3	@\$675.00/hr.	\$ 202.50			
3-14-24	REV GFA 8-1-21 AG between Walter Forrest Dawson & State Farm GFA, LLC	.5	@\$450.00/hr.	\$ 225.00			
3-14-24	REV memorandum of AG IPSL referral programs	.3	@\$450.00/hr.	\$ 135.00			
3-14-24	REV SCH of Semi-monthly Variable Comp	.5	@\$450.00/hr.	\$ 225.00			
3-14-24	Cont'd. REV of suppl. production of State Farm DOCS	.7	@\$450.00/hr.	\$ 315.00			
3-14-24	Cont'd. REV of suppl. production of DOCS Re the agent's obligations per AG to attend ethics training and other State Farm approved programs; agent's obligation to train & "manage" (not defined) his own employees; 4:10 pm	.9	@\$450.00/hr.	\$ 405.00			
3-14-24	REV of Operation Guide (OG) suppl. DOC production pages; 4:12 pm- 4:44 pm	.5	@\$450.00/hr.	\$ 225.00			
3-15-24	Cont'd. REV of OG; 9:00 am- 9:45 am	.7	@\$450.00/hr.	\$ 315.00			
3-15-24	Cont'd. REV of OG 9:45 am- 11:30 am	2.5	@\$450.00/hr.	\$1,575.00			
3-15-24	Cont'd. REV of OG Suppl. DOCS						

Page 17. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
3-15-24	Cont'd Re encouraging claim handlers to exercise judgment on each claim; communicate claim handling philosophy; end 2:12 pm-1:46 pm	1.1	@\$450.00/hr.	\$ 495.00			
3-15-24	TT/TCW CSL Mr. Bultz on Agency AG 8-1-21 effective date	.1	@\$450.00/hr.	\$ 45.00			
3-15-24	Cont'd. REV of notes taken and PREP Rule 26 O'Neal DECL; 2:00 pm-2:45 pm	.7	@\$450.00/hr.	\$ 315.00			
3-20-24	Cont'd. REV of notes taken and PREP Rule 26 O'Neal DECL; 10:30 am-11:13 am	.7	@\$450.00/hr.	\$ 315.00			
4-5-24	Complete initial Draft of Rule 26 O'Neal DECL;	2.5	@\$450.00/hr.	\$1,125.00			
4-5-24	TT CSL Mr. Bultz and LMTC Re rough draft of Rule 26 O'Neal DECL	.1	@\$450.00/hr.	\$ 45.00			
4-5-24	TT CSL Mr. Herschlip and LMTC Re rough draft of Rule 26 O'Neal DECL; available to discuss	.1	@\$450.00/hr.	\$ 45.00			
4-5-24	Drafted (DR) and Emailed to CSL DR Of DECL and focus at 5:39 pm	.2	@\$675.00/hr.	\$ 135.00			
4-8-24	Making revisions/ corrections of typos DR of DECL emailed on 4-5-24; 4:00 pm	.9	@\$450.00/hr.	\$ 405.00			
4-8-24	TT CSL Mr. Herschlip work w/no ans. and no						

Page 18. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
4-8-24	Cont'd. message at 4:56			N/C			
4-8-24	TT CSL Mr. Herschlip cell w/no ans. and no message at 4:59 pm			N/C			
4-8-24	TT CSL Mr. Bultz cell w/no ans. and LMTC message RE revisions, 5:01 pm			N/C			
4-8-24	Cont'd. REV & revision of DECL DR; 5:09 pm-6:10 pm	1.1	@\$675.00/hr.	\$ 742.50			
4-9-24	Emailed both CSL requesting (RQ) call back and O'Neal Rule 26 DECL revisions; 2:55 pm	.1	@\$450.00/hr.	\$ 45.00			
4-19-24	RAR email from Mr. Bultz re DR with updated track change revisions; need to file it by end of day and my RQ to see process server's sworn DECL on Mr. Muse's felony forgery conviction and REV of DECL; 1:36 pm	.1	@\$450.00/hr.	\$ 45.00			
4-19-24	TF/TCW CSL Mr. Bultz Re DR of DECL and the process server's DECL; 1:42 pm	.2	@\$450.00/hr.	\$ 90.00			
4-19-24	REV DECL of Process server Timofey A. Samoylenke due Diligence to serve John Muse, Muse's evasive						

Page 19. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
4-19-24	Cont'd. conduct Re service attempts; and reference to John Muse's felony forgery conviction; 2:49 pm	.2	@\$450.00/hr.	\$ 90.00			
4-19-24	RAR email from CSLs' office mgr Mr. Adan WA Dept. of Corrections on Mr. Muse's felony forgery conviction; w/attachment for signature; 3:05 pm	.1	@\$450.00/hr.	\$ 45.00			
4-19-24	RAR email from CSLs' office mgr Mr. Adan; w/stipulated protective order attachment for REV and signature; 3:15 pm	.1	@\$450.00/hr.	\$ 45.00			
4-19-24	RAR 15-page Protective Order from CSLs' mgr Mr. Adan for my; signature; 3:20 pm	.3	@\$450.00/hr.	\$ 135.00			
4-19-24	TT/TCW Mr. Bultz Re DECL and correction for Signature; 4:17 pm – 4:25 pm	.2	@\$450.00/hr.	\$ 90.00			
4-19-24	RAR email from CSLs' office mgr Mr. Adan; w/"clean" copy attachment of Rule 26 DECL For REV and signature; 4:26 pm	.1	@\$450.00/hr.	\$ 45.00			
4-19-24	RAR email from CSLs' office mgr Mr. Adan;						

Page 20. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
4-19-24	Cont'd. w/ "clean" copy attachment of Rule 26 DECL for REV and signature; 4:47 pm	.1	@\$450.00/hr.	\$ 45.00			
4-19-24	RAR email from CSLs' office mgr Mr. Adan; w/copy of signed Protective Order; 5:02 pm	.1	@\$675.00/hr.	\$ 67.50			
4-19-24	RAR email from DBL via Adobe Acrobat incl. Signed Protective Order; 5:02 pm	.1	@\$675.00/hr.	\$	Courtesy N/C		
4-19-24	RAR email from CSL Mr. Bultz w/attachment of Rule 26 DECL for REV/revision; and signature; 7:54 pm	.2	@\$675.00/hr.	\$	Courtesy N/C		
4-19-24	RAR email with Rule 26 DECL. Final Version For my Signature; 8:12 pm	.1	@\$675.00/hr.	\$ 67.50			
4-19-24	RAR email with Rule 26 DECL. Final Version with my signature; 8:15 pm	.1	@\$675.00/hr.	\$ 67.50			
4-19-24	RAR email from Mr. Adan with Rule 26 DECL. Final Version with my Signature and and Protective Order with my Signature; 8:25 pm	.1	@\$675.00/hr.	\$ 67.50			
4-27-24	RAR email from Mr. Bultz on EXW Report Final; 11:45 am	.1	@\$450.00/hr.	\$	Courtesy N/C		
4-29-24	TT Mr. Bultz on 4- 27-24 email; 2:04 pm	.1	@\$450.00/hr.	\$	Courtesy N/C		

Page 21. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
4-30-24	TF/TCW Mr. Bultz RQ I email the RQ Signature	.1	@\$450.00/hr.	\$ 45.00			
4-30-24	TT/TCW Mr. Bultz on 4-27-24 email; 11:39 am	.1	@\$450.00/hr.	\$	Courtesy N/C		
4-30-24	RAR email from Mr. Bultz on 4-27- -24 email Re Rule 26 DECL Final; RQ I ignore email; it incl. older version of Rule 26 DECL; 11:45 am	.1	@\$450.00/hr.	\$	Courtesy N/C		
5-17-24	TT Mr. Bultz Re #34 blank STA; with no answer; 2:05 pm				N/C		
5-17-24	TT Mr. Bultz Re STA; 2:10 pm;	.1	@\$450.00/hr.	\$ 45.00			
5-20-24	RAR CSL Mr. Bultz's 3:45 pm Email Re rebuttal EXW's report; 4:00 pm	.1	@\$450.00/hr.	\$ 45.00			
5-20-24	Emailed CSL Mr. Bultz; out of office; we would talk Re rebuttal report on my RTW; 4:51 pm	.1	@\$450.00/hr.	\$	Courtesy N/C		
5-25-24	RAR email from DBL via Adobe Acrobat incl. to REV and Sign Rule 26 DECL; 1:08 am	.1	@\$675.00/hr.	\$	Courtesy N/C		
5-29-24	Begin REV of State Farm EXW's reply Report; 10:00 am- 10:25 am	.4	@\$450.00/hr.	\$ 180.00			
5-29-24	Cont'd. REV of State Farm EXW Danette K.						

Page 22. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
5-29-24	Cont'd. Leonhardi's rebuttal report; 10:30 am-11:30 am	1.0	@\$450.00/hr.	\$ 450.00			
5-29-24	Cont'd. REV of State Farm EXW Danette K. Leonhardi's reply report; 11:40 am-12:40 pm	1.0	@\$450.00/hr.	\$ 450.00			
5-29-24	Cont'd. REV of State Farm EXW Danette K. Leonhardi's reply report; end 1:00 pm-1:20 pm	.3	@\$450.00/hr.	\$ 135.00			
6-17-24	TF/TCW Mr. Adan Re his email NT of my deposition; 2:00 pm	.1	@\$450.00/hr.	\$ 45.00			
6-17-24	RAR email From Mr. Adan and CSL Re attached Amended NT of Videotape Deposition; Amended Subpoena to Testify At Depo; with EXH "A" RQ for my file EXW file one week Prior; 5:05 pm	.3	@\$675.00/hr.	\$ 202.50			
7-2-24	TF CSL Mr. Bultz And Mr. Alex Rowen for DCN of State Farm rebuttal EXW Danette K. Leonhardi's reply Report; 3:00 pm-4:23 pm	1.4	@\$450.00/hr.	\$ 630.00			
7-3-24	Faxed 5 pages of handwritten notes to CSL Mr. Herschlip and						
7-3-24	Cont'd. Mr. Bultz; 4:42 pm	.1	@\$450.00/hr.	\$ 45.00			
7-9-24	Cont'd. TF/TCW CSL						

Page 23. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
7-9-24	Cont'd. Mr. Bultz, Mr. Rowen, Re DEPO PREP and Re DCN with Ms. O'Neal; 11:01 am-12:16 pm	1.4	@\$450.00/hr.	\$ 630.00			
7-9-24	TF CSL Mr. Herschlip's and Mr. Bultz's office mgr Mr. Adan for DCN with Ms. O'Neal	.1	@\$450.00/hr.	\$ 45.00			
7-9-24	Fax Ins Expert Witness file notes on O'Neal to both CSL, Mr. Herschlip and Mr. Bultz	.3	@\$450.00/hr.	\$ 135.00			
7-9-24	TF/TCW CSL Mr. Bultz Re. State Farm EXW Danette K. Leonhardi's rebuttal report; theft definition; Gov. Jay Inslee's Stay Home Stay Healthy Proclamation and Appendix on "Essential critical Infrastructure Workers"	.5	@\$450.00/hr.	\$ 225.00			
7-10-24	Fax Ins Expert Witness file notes and other DOCs on O'Neal to both CSL, Mr. Herschlip and Mr. Bultz; 2:45 pm	.4	@\$450.00/hr.	\$ 180.00			
7-11-24	RAR Microsoft Teams invite NT of phone conference meeting with Ms. O'Neal, and CSL plus link; 1:53 pm	.1	@\$450.00/hr.	\$ 45.00			

Page 24. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
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7-11-24 TF/TCW CSL Mr.

Mr. Bultz and Ms.

O'Neal on facts;

On 3-12-2020 she

Went to Agent's

Forrest Dawson's

office; original PR

not familiar to

insured; she only

inputted the Suppl.

Police report; she

Corrected value

amounts; on her

stolen personal

property; DCN

with CSL on pre-

DEPO issues;

end. 4:22 pm

2.4 @\$450.00/hr.

\$1,080.00

7-11-24 RAR email with
original and suppl.

PRs during TCW

Ms. O'Neal

\$ Courtesy N/C

7-11-24 RAR email from

CSL Mr. Bultz

With Zoom link

For tomorrow's

EXW deposition

.1 @\$450.00/hr.

\$ 45.00

7-11-24 TF/TCW CSL Mr.

Bultz and Mr.

Rowen for Pre-

Issues DCN;

(after hours)

2.5 @\$675.00/hr.

\$1,687.50

7-12-24 DEPO by State

Farm CSL Mr.

Hicks 9 Hrs;

on Zoom 8:58 am

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Paid by Def CSL Mr. Hicks'

7-12-24 RAR 10:56 am

email from

Mr. Adan with

DOCs attached;

REV of attached

DOCS; 6:58 pm

(after hours)

.2 @\$675.00/hr.

\$ 135.00

7-15-24 RAR email from

Mr. Bultz Re

PREP of Rule 26

Report and Depo;

Page 25. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
7-15-24	Cont'd. RQ for depo Invoice to be sent Def CSL; CNF Not billed for EXW Invoice PREP; 10:44 am	.1	@\$450.00/hr.	\$	Courtesy N/C		
7-15-24	Emailed Mr. Bultz CNF PREP of separate Zoom depo testimony invoice, 8:58 am- 6:00 pm; 11:24 am	.1	@\$450.00/hr.	\$	45.00		
7-15-24	RAR email from Mr. Bultz CNF my 11:24 email to him and will send def CSL my EXW Retainer incl my standard and after hours depo rates; 11:28 am	.1	@\$450.00/hr.	\$	45.00		
7-15-24	Emailed Mr. Bultz Re N/C on invoice PREP; 12:20 pm			\$	Courtesy N/C		
7-15-24	Emailed CSL my O'Neal EXW depo Appearance and Testimony invoice For def CSL PMT; 1:40 pm			\$	Courtesy N/C		
7-15-24	RAR email from Mr. Bultz CNF my 1:40 email to him incl attached depo testimony invoice; 1:56 pm			\$	Courtesy N/C		
7-15-24	Emailed CSL my W-9 To Mr. Bultz per def CSL's RQ; 3:24 pm			\$	Courtesy N/C		
7-15-24	RAR email from Mr. Bultz CNF receipt of W-9; 6:15 pm			\$	Courtesy N/C		
7-16-24	RAR email from Mr. Bultz on typo						

Page 26. Debra O'Neal Billing Statement #1

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
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7-16-24	Cont'd. depo testimony date on invoice; 9:18 am			\$	Courtesy N/C		
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7-16-24	TT/TCW Mr. Bultz; DCN Re my testimony was good; no issues per Mr. Herschlip; comments about CSL's leading Qs; 3:51 pm	.4	@\$450.00/hr.	\$	180.00		
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7-16-24	RAR email from Mr. Bultz CNF depo testimony \$ Pmt initiated; 4:23 pm						
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8-9-24	TT/TCW CSL Mr. Bultz RE STA on Receipt of my depo transcript for REV; DCN Re depo of Def's rebuttal EXW Depo and possible SCH of mediation; 11:31 am	.2	@\$450.00/hr.	\$	90.00		
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Sub-total Standard Hours:	77.3 @ \$450.00/Hr:	\$34,785.00
Sub-total After Hours	5.3 @ \$675.00/Hr:	\$ 3,577.50
Subtotal of Billing Time:		\$38,362.50
Less 10 Hour Advance Payment x \$450.00:		-\$ 4,500.00
Net Outstanding Balance:		\$33,362.50

Payment is due upon receipt. Please make check payable to Robert J. Worth, Esq. and mail it to address listed on the letterhead.

Date: 8-13-2024
By: Robert J. Worth

Please Review and Confirm Authorized Approval Below:

By: Dubs Herschlip, Esq. and/or Rafael Bultz, Esq.
Dunlap Bennett & Ludwig

_____	_____	Date: _____
Print Name	Signature	

ROBERT J. WORTH, ESQ.
INSURANCE EXPERT WITNESS
23801 Calabasas Road, Suite 2033
Calabasas, CA 91302
(818) 222-2433; (818) 222-2139 (FAX)
Email: robert@robertworthlaw.com

November 12, 2024

Client(s): Dubs Herschlip & Rafael Bultz
Dunlap Bennett & Ludwig
627 5th St., Suite 203
Mukilteo, WA, 98275 *via e-mail only:* dubs@dbllawyers.com; rbultz@dbllawyers.com

United States District Court – Western District of Washington at Seattle
Case No.: 2:23-cv-00232-EKE
Billing Statement #2: Debra O’Neal v. State Farm Fire Insurance Co.

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
9-3-24	RAR of Def Csl’s Motion to exclude RJW expert witness from testifying at trial date on invoice; 3:00 pm	.3	@\$450.00/hr.	\$ 135.00			
9-3-24	RAR Def Csl’s Declaration in support Of motion to exclude expert witness RJW from testifying at trial 4:19 pm	.1	@\$450.00/hr.	\$ 45.00			
9-3-24	TT Dubs Herschlip and Rafael Bultz, but not available and left message to call with operator; 4:27 pm	.1	@\$450.00/hr.	\$	Courtesy N/C		
9-5-24	TT/TCW Rafael Bultz RE: defendant Csl’s motion to exclude my CV produced as an exhibit & not my Rule 26 Declaration; def csl’s Decl. not accurate; DCN RE: his exhibit is not accurate; I handled coverage questions, know law to						

Page 2. Debra O'Neal Billing Statement #2

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
9-5-24	Cont'd. determine liability for negligence or comparative negligence and value without being an atty; not handling claims in WA is irrelevant just as not being a licensed attorney in WA is not relevant; 4:58 pm	.2	@\$450.00/hr.	\$ 90.00			
10-3-24	RAR 10-3-24, 2:32 pm email from William Adan RE: acceptance of SDT via email;	.1	@\$450.00/hr.	\$ 45.00			
10-4-24	RAR 10-4-24, email from Mr. Bultz RE: Ct denial of def. motion to exclude RJW EXW from Testifying; 4:32 pm	.1	@\$450.00/hr.	\$ 45.00			
10-4-24	Email to Mr. Bultz CNF Ct overruling of def. motion to exclude RJW EXW from testifying; TT Mr. Bultz unsuccessful & RQ for RJW DEPO transcript; I will REV CT's Ct's Order; 4:53 pm	.1	@\$450.00/hr.	\$ 45.00			
10-4-24	RAR 10-4-24, email from Mr. Bultz RE: new phone system not yet activated; 5:01 pm	.1	@\$675.00/hr.	\$ 67.50			
10-9-24	RAR 10-4-24, Mr. email 3:28 p.m. from Mr. Bultz RE: date of my testimony appearance on 10-31-24 pm or 11-1-24 am & Q on whether CT Reporter sent my						

Page 3. Debra O'Neal Billing Statement #2

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
10-9-24	Cont'd. (CTRP) DEPO transcript; 3:55 pm	.1	@\$450.00/hr.	\$ 45.00			
10-9-24	Email reply to Mr. Bultz my reply of no DEPO transcript received; RQ for DCN RE scheduling my flight; my travel to hotel; responses on direct and cross;	.1	@\$450.00/hr.	\$ 45.00			
10-9-24	RAR 10-4-24, 2:01email from Mr. Bultz RE: date change: my testimony to 10-29-24 & travel costs reimbursement post-trial v. pre; SCH a pre-trial meeting (MTG) on 10-26-24; no DEPO transcript	.1	@\$450.00/hr.	\$ 45.00			
10-11-24	Email to Mr. Bultz RE: date change RE my work schedule; 12:04 pm	.1	@\$450.00/hr.	\$ 45.00			
10-11-24	RAR 12:59 pm email from Mr. Bultz on change on of my TL testimony day to Oct. 29 th or Oct. 27 th ; can't pay for transcript or reimburse travel costs upfront due their client's lack of funds; pick up & drop off; SCH of TL PREP MTG	.1	@\$450.00/hr.	\$ 45.00			
10-11-24	email 2:02 pm to Mr. Butlz RE no DEPO transcript from CT Rptr; my TL TEST on 29 th / time; TL Preq Qs	.1	@\$450.00/hr.	\$ 45.00			

Page 4. Debra O'Neal Billing Statement #2

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
10-11-24	RAR 2:13 pm from Mr. Butlz contacting CT RPR; TL PREP MTG on Oct 27 th ; very low \$ offer	.1	@\$450.00/hr.	\$ 45.00			
10-11-24	Email 2:28 pm to Mr. Butlz: return Flight scheduling	.1	@\$450.00/hr.	\$ 45.00			
10-11-24	RAR 2:50 pm from Mr. Bultz on return flight; his RQ 10/30	.1	@\$450.00/hr.	\$ 45.00			
10-14-24	Email 1:21 pm to Mr. Bultz, will get flexible flight reservations; STA on transcript for TL PREP	.1	@\$450.00/hr.	\$ 45.00			
10-14-24	RAR 4:18 pm from Mr. Herschlip: His RQ to Mr. Bultz to Call CT RPTR for STA on transcript	.1	@\$450.00/hr.	\$ 45.00			
10-14-24	RAR 2:34 pm from Mr. Herschlip: RQ to attend/observe TL & be available as rebuttal witness	.1	@\$450.00/hr.	\$ 45.00			
10-14-24	Email reply at 4:31 pm to Mr. Herschlip: I agree; Q RE: RTN TVL home 10/30 in evening	.1	@\$450.00/hr.	\$ 45.00			
10-14-24	RAR 8:14 pm from Mr. Herschlip and His agreement;	.1	@\$675.00/hr.	\$ 67.50			
10-21-24	RAR email 5:07 P.M. ReL 3 rd party Kent PD theft of property report TEST prep	.1	@\$675.00/hr.	\$ 67.50			
10-21-24	RAR email 5:09 p.m.	.1	@\$675.00/hr.	\$ 67.50			

Page 5. Debra O'Neal Billing Statement #2

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
10-23-24	RAR email 1:53 p.m. to Csl flight SCH and hotel .	.1	@\$450.00/hr.	\$ 45.00			
10-23-24	RAR email 6:25 p.m. From Mr. Herschlip CNF receipt of my SCH flight travel	.1	@\$675.00/hr.	\$ 67.50			
10-24-24	RAR email 5:15 p.m. From Mr. Bultz's RQ to change my Seattle Flight and attend Ms. O'Neal TL testimony	.1	@\$675.00/hr.	\$ 67.50			
10-25-24	Email reply at 10:20 a.m. to Mr. Bultz that I will purchase flexible ticket for 10/28	.1	@\$450.00/hr.	\$ 45.00			
10-25-24	Email reply at 3:22 p.m. to Mr. Bultz with new flight arrival time & information	.1	@\$450.00/hr.	\$ 45.00			
10-26-24	Zoom Trial Prep Qs on 2:58 pm MTGW Mr. Herschlip, Mr. Bultz, and Mr. Rowan RE: Claim handling of O'Neal claim/ Carrier's conduct to 5:22 pm, end:	2.4	@\$675.00/hr.	\$ 1,620.00		(Courtesy N/C for after hours time)	
10-27-24	RAR 8:21 a.m. email from Mr. Herschlip to Ms. O'Neal to REV list of Qs he wWill ask her in TL on 10/28, and working on EXH	.1	@\$675.00/hr.	\$ 67.50		(Courtesy N/C for after hours time)	
10-27-24	RAR 1:20 pm email from Mr. Herschlip RE: Can't attach ST Farm CLM File;						

Page 6. Debra O'Neal Billing Statement #2

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
10-27-24	Cont'd. it's too big; he will send secure for reviewing;	.1	@\$675.00/hr.	\$ 67.50			
10-27-24	RAR 1:22pm email from Mr. Herschlip w/shared file EXH #43	.1	@\$675.00/hr.	\$ 67.50			
10-27-24	RAR 1:41 p.m. Email from Mr. Herschlip to Ms. Staying at same Hotel	.1	@\$675.00/hr.	\$ 67.50			
10-27-24	Limited Rev of EXH #43	1.0	@\$650.00/hr.	\$ 675.00			
10-27-24	RAR 3:18 pm From Mr. Bultz on CT's Order MILs	.1	@\$675.00/hr.	\$ 67.50			
10-27-24	RAR 3 rd party Kent PD theft of property report involving Def Mr. Muse; 4:26 pm	.1	@\$675.00/hr.	\$ 67.50	(Ck email)		
10-27-24	Draft (DR)/email 8:41 p.m. 3 points w/ elaboration;	.6	@\$675.00/hr.	\$ 405.00			
10-27-24	RAR 4:36 p.m. Email from Ms. O'Neal: She's in Marysville and CNF MTG on Monday	.1	@\$450.00/hr.	\$ 45.00			
10-27-24	TT hotel for early Arrival check-in 5:08 pm, (2 calls)	.2	@\$675.00/hr.	\$ 135.00			
10-27-24	RAR 5:08 pm email from Mr. Herschlip; down- load Exh. #43; 5:43 pm;	.1	@\$675.00/hr.	\$ 67.50			
10-27-24	RAR 5:25 p.m. Email from Ms. O'Neal on time						

Page 7. Debra O'Neal Billing Statement #2

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
10-27-24	Cont'd. & meeting location	.1	@\$675.00/hr.	\$ 67.50			
10-27-24	RAR 5:37 p.m. Email from Mr. Herschlip to Ms. O'Neal 5:23 p.m. talk tomorrow	.1	@\$675.00/hr.	\$ 67.50			
10-27-24	RAR 5:37 p.m. Email from Mr. Herschlip to Ms. O'Neal on pre-TL MTG at Starbuck's	.1	@\$675.00/hr.	\$ 67.50			
10-27-24	Downloaded "Debra Outline" And REV Qs; 6:00 pm	.1	@\$675.00/hr.	\$ 67.50			
10-27-24	RAR 6:13 p.m. Email from Ms. O'Neal CNF MTG email from Mr. Herschlip	.1	@\$675.00/hr.	\$ 67.50			
10-27-24	Drafted 3 points Email outline per Mr. Herschlip's RQ, and elaborated; End 6:42 pm;	.6	@\$675.00/hr.	\$ 405.00			
10-28-24	Travel 4:25 am to Burbank Airport; fly to Seattle, WA for trial; in flight REV MIL CT order; at trial; walk to CtH 11:43 am; opening Stmts; O'Neal TL Test. 1:00 p.m.;— DCN; 5 :15 pm;	3.6	@\$975.00/hr.	\$ 3,510.00	+ 9.0	@\$650.00/hr.	\$ 6,850.00 (12.6 hrs.)
10-29-24	9:00 am walk to CtH for; witness test., observing, taking notes; my test. direct/cross EXO to 4:36 p.m.; + post-CT EXW TEST. DCN; end						

Page 8. Debra O'Neal Billing Statement #2

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
10-29-24	Cont'd. 5:15 pm;	8.0	@\$650.00/hr.	\$ 5,200.00	+ .3 @\$975.00/hr.	\$ 292.50	

10-30-24	7:00 am MTGW Mr. Herschlip/ Mr. Bultz EXW TL PREP/Qs 8:10 am;	1.3	@\$650.00/hr.	\$ 845.00	+ 1.0 @\$975.00/hr.	\$ 975.00	
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10-30-24	Go to court 8:10 am for TL and my EXW re-direct testimony; to 4:35 p.m. then DCN in MTG Rm; to 5:00 pm; walk to hotel/check- out;	8.8	@\$650.00/hr.	\$ 5,720.00			
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10-30-24	Travel 5:20 pm by Uber to SEATAC for Rtn flight to Burbank;(but w/ maintenance departure delay); arrival @ home 11:56 pm; end	6.3	@\$975.00/hr.	\$ 6,142.50			
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10-31-24	RAR 7:50 email From CTrm Deputy to Csl RQ my email to provide a Zoom link; (below Mr. Mr. Herschlip's 8:04 am email to Ms. Staples that he cc'd me	.1	@\$650.00/hr.	\$ 65.00			
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10-31-24	Sent 8:03 am email RE: phone or Zoom link for Team Mgr. Elvie Owens-Powers direct by Def Csl; then Def's Exw EXW's testimony	.1	@\$650.00/hr.	\$ 65.00			
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10-31-24	RAR 8:04 am email from Mr. Bultz to Ctrm Deputy Diyana Staples to Csl for my email address to email me link	.1	@\$650.00/hr.	\$ 65.00			
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Page 9. Debra O'Neal Billing Statement #2

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
10-31-24	TT Mr. Bultz 8:35 a.m.; left message on receipt of phone or Zoom link to listen or watch TL testimony today?	.1	@\$650.00/hr.	\$ 65.00			
10-31-24	Received & link accessed court link, 8:23 am; listened to Def EXW direct & cross testimony; to end; 11:36 am; TT Mr. Bultz LMTC RE: phone or Zoom link to listen or watch TL testimony; TF/ TCW Wm. Adan on STA & on use of proposed Qs to Def EXW; end 5:20 pm	8.4	@\$650.00/hr.	\$ 5,460.00	+ .4 @ \$975.00/hr.	\$ 390.00	
11-1-24	Received 10-31-24 10:40 pm email on no attendance at TL tomorrow	.1	@\$650.00/hr.	\$ 45.00			
11-1-24	PREP 9:16 am email CNF to Mr. Bultz RE no TL attendance but provided reminder suggestions for Mr. Herschlip's cross-exam of Def's EXW RE WA Gov. Proclamation in her Rule 26 Decl. to stay home & stay safe is not consistent with Proclamation's exceptions and EXW's testimony on St Farm timeliness conduct; poor IV; & closing: no "Theft" definition; failure to give benefit of doubt to insured;						

Page 10. Debra O'Neal Billing Statement #2

<u>Date(s)</u>	<u>Billing Time-Activity</u>	<u>Hours</u>	<u>Billing-Rate</u>	<u>\$ Due</u>	<u>Payments</u>	<u>Balance Due</u>	<u>Total</u>
11-1-24	Cont'd. Def EXW's stmt.: I acted like a claim handler based on my on DCN w/ Kent P.D. commander; SIU IV of O'Neal; red flags on Mr. Muse; poor, inadequate St. Farm claim handlers & agent training.	.2	@\$450.00/hr.	\$ 90.00			

Prior Billing Time Invoice:	\$38,362.50
Less Initial Fee Advance:	<u>-\$ 4,500.00</u>
Prior Net Outstanding Balance:	\$33,862.50
Prior Initial Partial Payment Received:	<u>-\$18,000.00</u>
Prior Outstanding Unpaid Balance:	\$15,862.50

Supplemental Standard Insurance Expert Time Fee:	2.9 @ \$450.00/Hr:	\$ 1,305.00
Supplemental Standard Insurance Expert Time Fee:	37.0 @ \$650.00/Hr:	\$24,050.00
Supplemental After Hours Insurance Expert Time Fee:	6.7 @ \$675.00/Hr :	\$ 4,522.50
Supplemental Standard Insurance Expert Time Fee:	5.3 @ \$975.00/Hr:	<u>\$ 5,167.50</u>
Total Supplemental Insurance Expert Billing Time:		\$35,045.00
Prior Outstanding Unpaid Balance:		<u>\$15,862.50</u>
Outstanding (Out-of-State) Trial Appearance) Costs:		\$50,907.50
Insurance Expert Witness Costs:		<u>\$ 1,661.64</u>
Total of Insurance Expert Fees and Costs Due:		\$52,569.14

Payment is due upon receipt. Please make check payable to Robert J. Worth, Esq. and mail it to address listed on the letterhead.

Date: 11-12-2024

By: Robert J. Worth

Please review, confirm and return authorized approval with invoice payment: (See Below):

By: Dubs Herschlip, Esq. and/or Rafael Bultz, Esq.,
Dunlap Bennett & Ludwig

Print Name

Signature

Date:

EXHIBIT E

Debra O'Neal v. State Farm Fire and Casualty Co.**Case No. 2.23-cv-00232-KKE**

Plaintiff's Attorney fees 11/5/2024 through 11/18/2024:

Title	Name	Rate	Hours	Total:
Partner Attorney	Dubs Herschlip	\$ 550.00 / Hr	12.4	\$ 6,820.00
Associate Attorney	Alex Rowan	\$ 395.00 / Hr	3.6	\$ 1,417.00
Associate Attorney	Rafael Bultz	\$ 385.00 / Hr	21	\$ 8,085.00
Paralegal	William Adan	\$195.00 / Hr	1.7	\$ 331.50
			Total	\$ 16,653.50

DATE	NAME	DESCRIPTION	RATE	HOURS	TOTAL
11/5/2024	Alex Rowan	Discussing post-trial drafts and motions with attorneys D. Herschlip and R. Bultz.	395.00	0.30	\$ 118.50
11/5/2024	Dubs Herschlip	Update action list to include legal research, draft order on CR 54 motion, chronology of fees, request to expert for final invoice, compilation of all invoices, costs bill, and affidavit of second	550.00	0.10	\$ 55.00
11/5/2024	Dubs Herschlip	Teams call with AR and RB to dictate assignments including legal research, draft order on CR 54 motion, chronology of fees, request to expert for final invoice, compilation of all invoices, costs	550.00	0.30	\$ 165.00
11/5/2024	Dubs Herschlip	Continue researching prior costs, and evidence in support of costs bill.	550.00	0.40	\$ 220.00
11/5/2024	Rafael Bultz	Drafting declaration and cost bill for post-judgment.	385.00	1.80	\$ 693.00
11/5/2024	Rafael Bultz	Research into attorney's fees for IFCA violation for post-judgment.	385.00	1.20	\$ 462.00
11/5/2024	Rafael Bultz	Met with D. Herschlip, A. Rowan, and Tracy regarding next steps for post judgment and tasks.	385.00	0.30	\$ 115.50
11/5/2024	William Adan	Communicated with attorney Alex Rowan	195.00	0.10	\$ 19.50
11/5/2024	William Adan	Researched internal documents for attorney Dubs Herschlip.	195.00	0.90	\$ 175.50
11/6/2024	Dubs Herschlip	Receive and review invoice from Premium Processing for witness fee appearing twice at trial.	550.00	0.10	\$ 55.00
11/7/2024	Alex Rowan	Drafting Rule 54(d) motion for attorney fees.	395.00	0.20	\$ 79.00
11/7/2024	Alex Rowan	Drafting the memorandum of law in support of Rule 54(d) motion for attorney fees	395.00	0.70	\$ 276.50
11/7/2024	Alex Rowan	Starting to draft the declaration of Dubs Herschlip in support of attorney fees.	395.00	0.20	\$ 79.00
11/7/2024	Dubs Herschlip	Review file. Meet with WA to review invoices and documents related to attorney fees incurred during the claims period, and after the claims period.	550.00	0.50	\$ 275.00
11/8/2024	Alex Rowan	Calling paralegal W. Adan for update on status of collecting attorney fee invoices for Rule 54(d)	395.00	0.10	\$ 39.50
11/8/2024	Dubs Herschlip	EMAIL TO PRIOR FIRM'S TECH ADMIN THE20. REVIEW ARCHIVED DATH COMPUTER FOR INVOICES DURING 9/2022 AND 3/2023. MEET WITH WA. RECEIVE EMAIL FROM THE20.	550.00	0.80	\$ 440.00
11/8/2024	Rafael Bultz	Call with expert witness Robert Worth regarding need for him to submit his final bill.	385.00	0.10	\$ 38.50
11/8/2024	William Adan	Researched internal documents for attorney Dubs Herschlip.	195.00	0.20	\$ 39.00
11/11/2024	Alex Rowan	Discussing case status updates and the attorney fee motion with partner D. Herschlip.	395.00	0.20	\$ 79.00
11/11/2024	Dubs Herschlip	Teams meeting with AR and RB to discuss case status and assign tasks including motion for attorney fees and costs, invoices, declaration of DH ISO motion, proposed order, worth invoices	550.00	0.30	\$ 165.00
11/12/2024	Alex Rowan	Researching examples of attorney fee declarations.	395.00	0.30	\$ 118.50
11/12/2024	Alex Rowan	Discussing obtaining client invoices and billing entries with R. Mays and A Kahn.	395.00	0.20	\$ 79.00
11/12/2024	Dubs Herschlip	Receive and reply to emails from Finance and AR regarding attorney fees for AR.	550.00	0.10	\$ 55.00
11/12/2024	Dubs Herschlip	Review FCRP 54.	550.00	0.10	\$ 55.00
11/12/2024	Dubs Herschlip	Teams call with AR regarding revisions to motion for attorney fees and costs bill.	550.00	0.10	\$ 55.00
11/12/2024	William Adan	Communicated with client Debra O'Neal.	195.00	0.10	\$ 19.50
11/12/2024	William Adan	Communicated with attorney Robert Worth	195.00	0.20	\$ 39.00
11/13/2024	Alex Rowan	Corresponding with partner D. Herschlip and attorney R. Bultz about the Rule 54(d) motion.	395.00	0.20	\$ 79.00
11/13/2024	Dubs Herschlip	Receive and review summary of invoices over the period. Email to WA, RB and AR on drafting	550.00	0.30	\$ 165.00
11/13/2024	Rafael Bultz	Reviewed and organized all time entries regarding attorney fees and expenses in preparation of motion for attorney fees and drafting of D. Herschlip's declaration for attorney fees.	385.00	2.90	\$ 1,116.50
11/14/2024	Alex Rowan	Discussing drafting of declarations and memorandum of law for the Rule 54(d) motion with	385.00	0.50	\$ 192.50
11/14/2024	Alex Rowan	Revising declaration based on personal experience and resume.	395.00	0.30	\$ 118.50
11/14/2024	Alex Rowan	Reviewing pivot table of attorney time entries to confirm accuracy	395.00	0.40	\$ 158.00
11/14/2024	Dubs Herschlip	Draft Herschlip Dec. ISO motion for attorney fees. Email RB draft and example dec for revisions.	550.00	1.30	\$ 715.00
11/14/2024	Dubs Herschlip	Review Dec of Dubs Herschlip ISO attorney fees version revised by RB. Meet with RB to dictate	550.00	0.20	\$ 110.00
11/14/2024	Rafael Bultz	Call attorney A. Rowan about fees discuss rule 54(d) motion, and drafting accompanying	385.00	0.50	\$ 192.50
11/14/2024	Rafael Bultz	Drafting of declaration of D. Herschlip in support of Plaintiff's motion for attorney fees.	385.00	3.50	\$ 1,347.50
11/14/2024	Rafael Bultz	Drafting and formatting of declaration of attorney fees consulting expert.	385.00	0.80	\$ 308.00
11/14/2024	Rafael Bultz	Additional call with attorney A. Rowan to discuss Rule 54(d) motion and accompanying	385.00	0.50	\$ 192.50
11/14/2024	William Adan	Communicated with attorney Rafael Bultz and Alex Rowan.	195.00	0.10	\$ 19.50
11/14/2024	William Adan	Communicated with attorney Robert Worth	195.00	0.10	\$ 19.50
11/15/2024	Dubs Herschlip	Receive and revise draft declaration of Dubs and Noah Davis ISO motion for attorney fees. Email to Noah Davis data reflecting work performed for hours billed, example dec., his draft dec., and	550.00	0.80	\$ 440.00
11/15/2024	Dubs Herschlip	Meet with RB to discuss my declaration and expert declaration ISO attorney fees to be filed	550.00	0.20	\$ 110.00
11/15/2024	Dubs Herschlip	Receive and review summary of costs.	550.00	0.10	\$ 55.00
11/15/2024	Rafael Bultz	Drafting and formatting of declaration of consulting expert for attorney fees.	385.00	0.50	\$ 192.50
11/15/2024	Rafael Bultz	Continued reviewing the numbers and drafted the declaration of D. Herschlip in support of the	385.00	4.60	\$ 1,771.00
11/15/2024	Rafael Bultz	Email to client D. O'Neal to approve attorney fees and expenses declaration.	385.00	0.10	\$ 38.50
11/18/2024	Dubs Herschlip	Receive and review email from Noah Davis with expert review of attorney fees.	550.00	0.20	\$ 110.00
11/18/2024	Dubs Herschlip	Review and revise attorney fee affidavit, motion for attorney fees and costs bill. 7:40-	550.00	0.10	\$ 55.00
11/18/2024	Dubs Herschlip	Legal research CR 54, IFCA and attorney fees tests of reasonableness. Revise declaration of Dubs Herschlip. Revise motion for attorney fees. Draft motion for costs.	550.00	3.80	\$ 2,090.00
11/18/2024	Dubs Herschlip	MEET WITH RB TO DISCUSS REVISIONS TO MOTION FOR ATTORNEY FEES, AND FEDERAL COSTS	550.00	0.20	\$ 110.00
11/18/2024	Dubs Herschlip	REVISE MOTION FOR ATTORNEY FEES AND DECLARATION OF DUBS HERCHLIP WITH EXHIBITS.	550.00	2.40	\$ 1,320.00
11/18/2024	Rafael Bultz	Drafting of Cost Bill.	385.00	0.50	\$ 192.50
11/18/2024	Rafael Bultz	Legal research into attorney fees under IFCA and 54(d).	385.00	0.60	\$ 231.00
11/18/2024	Rafael Bultz	Edit and revisions of Motion for Attorney Fees and Declaration of Dubs Herschlip ISO of motion.	385.00	3.10	\$ 1,193.50

\$ 16,653.50
